Environment Agency

Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2016

Decision document recording our decision-making process following review of a permit

The Permit number is: EPR/PP3237CR
The Operator is: Perenco UK Limited
The Installation is: Dimlington Gas Terminal
This Variation Notice number is: EPR/PP3237CR/V005

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on BAT conclusions.

We have reviewed the permit for this installation against the revised BAT Conclusions for the Refining of Mineral Oil and Gas industry sector published on 09 October 2014. This is our decision document, which explains the reasoning for the Consolidated Variation Notice that we are issuing.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. This review has been undertaken with reference to the decision made by the European Commission establishing best available techniques (BAT) conclusions ('BAT Conclusions') for the Refining of Mineral Oil and Gas as detailed in document reference IEDC-7-1. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position. It also provides a justification for the inclusion of any specific conditions in the permit that are in addition to those included in our generic permit template.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the Consolidated Variation Notice takes into account and brings together in a single document all previous variations that relate to the original permit issued. It also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the permit consistent with our current general approach and philosophy and with other permits issued to installations in this sector. Although the wording of some conditions has changed, while others have been removed because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the permit in any way. In this document we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

This is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position.

Throughout this document we will use a number of expressions. These are as referred to in the glossary and have the same meaning as described in "Schedule 6 Interpretation" of the permit.

We try to explain our decision as accurately, comprehensively and plainly as possible. We would welcome any feedback as to how we might improve our decision documents in future. A lot of technical terms and acronyms are inevitable in a document of this nature: we provide a glossary of acronyms near the front of the document, for ease of reference.

How this document is structured

Glossary of acronyms used in this document

(Please note that this glossary is standard for our decision documents and therefore not all these acronyms are necessarily used in this document.)

AAD	Ambient Air Directive (2008/50/EC)
APC	Air Pollution Control
BAT	Best Available Technique(s)
BAT-AEL	BAT Associated Emission Level
BATc	BAT conclusion
BREF	Best available techniques reference document
CEM	Continuous emissions monitor
CHP	Combined heat and power
COMEAP	Committee on the Medical Effects of Air Pollutants
CROW	Countryside and rights of way Act 2000
CV	Calorific value
DAA	Directly associated activity – Additional activities necessary to be carried out to allow the principal activity to be carried out
DD	Decision document
Derogation	from BAT AELs stated in BAT Conclusions under specific circumstances as detailed under Article 15(4) of IED where an assessment shows that the achievement of emission levels associated with the best available techniques as described in BAT conclusions would lead to disproportionately higher costs
EAL	Environmental assessment level
EIONET	European environment information and observation network is a partnership network of the European Environment Agency
ELV	Emission limit value derived under BAT or an emission limit value set out in IED
EMS	Environmental Management System
EPR	Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No. 1154)
EQS	Environmental quality standard
EU-EQS	European Union Environmental Quality Standard
Eunomia	Ballinger, Holland & Hogg (2011) Use of Damage Cost Data for BAT Decision Making: Report for the Environment Agency of England & Wales
EWC	European waste catalogue
FGD	Flue Gas Desulphurisation
FSA	Food Standards Agency
GWP	Global Warming Potential
HMT GB	Her Majesty's Treasury The Green Book - Appraisal and Evaluation in Central Government
HW	Hazardous waste
IED	Industrial Emissions Directive (2010/75/EU)
IPPCD	Integrated Pollution Prevention and Control Directive (2008/1/EC) – now superseded by IED
I-TEF	Toxic Equivalent Factors set out in Annex VI Part 2 of IED
I-TEQ	Toxic Equivalent Quotient calculated using I-TEF
LADPH	Local Authority Director(s) of Public Health

LCP	Large Combustion Plant subject to Chapter III of IED
LCPD	Large Combustion Plant Directive (2001/80/EC) – now superseded by IED
MSUL/MSDL	Minimum start up load/minimum shut-down load
NOx	Oxides of nitrogen (NO plus NO_2 expressed as NO_2)
NPV	Net Present Value
PAH	Polycyclic Aromatic Hydrocarbons
PC	Process Contribution
PEC	Predicted Environmental Concentration
PHE	Public Health England
POP(s)	Persistent organic pollutant(s)
PPS	Public participation statement
PR	Public register
PXDD	Poly-halogenated di-benzo-p-dioxins
PXB	Poly-halogenated biphenyls
PXDF	Poly-halogenated di-benzo furans
RGS	Regulatory Guidance Series
SAC	Special Area of Conservation
SGN	Sector guidance note
SHPI(s)	Site(s) of High Public Interest
SPA(s)	Special Protection Area(s)
SSSI(s)	Site(s) of Special Scientific Interest
TDI	Tolerable daily intake
TEF	Toxic Equivalent Factors
TGN	Technical guidance note
TOC	Total Organic Carbon
US EPA	United States Environmental Protection Agency
WFD	Water Framework Directive (2000/60/EC)
WHO	World Health Organisation

1 Our decision

We have decided to issue the Consolidated Variation Notice to the Operator. This will allow it to continue to operate the installation, subject to the conditions in the Consolidated Variation Notice.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the varied permit will ensure that a high level of protection is provided for the environment and human health.

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the Operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of “tailor-made” or installation-specific conditions, or where our Permit template provides two or more options.

2 How we reached our decision

2.1 Requesting information to demonstrate compliance with BAT Conclusions for the Refining of Mineral Oil and Gas.

We issued a Notice under Regulation 60(1) of the Environmental Permitting (England and Wales) Regulations 2010 (a Regulation 60 Notice) on 02 November 2015 requiring the Operator to provide information to demonstrate how the operation of their installation currently meets, or will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Notice also required that where the revised standards are not currently met, the Operator should provide information that:

- Describes the techniques that will be implemented before 28 October 2018, which will then ensure that operations meet the revised standard, or
- Justifies why standards will not be met by 28 October 2018, and confirmation of the date when the operation of those processes will cease within the installation or an explanation of why the revised BAT standard is not applicable to those processes, or
- Justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised standard described in the BAT Conclusions.

Where the Operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT AEL) described in the BAT Conclusions document, the Regulation 60 Notice requested that the Operator make a formal request for derogation from compliance with that AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 60 Notice response from the Operator was received on 03 March 2016.

We considered that the response did not contain sufficient information for us to commence the permit review. We therefore issued a further information request to the Operator on 06 October 2017. Suitable further information to allow us to begin our determination of the permit review was provided by the Operator on 22 November 2017.

2.2 Review of our own information in respect to the capability of the installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous regulatory activities with the facility we have no reason to consider that the Operator will not be able to comply with the conditions that we include in the permit.

In relation to BAT Conclusions 6, 49, 51, 55 and 56 we agree with the Operator in respect to their current stated capability as recorded in their Regulation 60 Notice response that improvements are required.

We have therefore included improvement conditions in the Consolidated Variation Notice, which requires them to upgrade their operational techniques so that the requirements of the BAT Conclusion are delivered by 28 October 2018. This is discussed in more detail in Section 5 of this document.

3 The legal framework

The Consolidated Variation Notice will be issued under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that the Consolidated Variation Notice will ensure that the operation of the installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

We have set the ELV's in line with the BAT Conclusions, unless a tighter limit was previously imposed and these limits have been carried forward. The emission limits and monitoring tables have been incorporated into Schedule 3 of the permit.

4 Key Issues

The key issues arising during this permit review are:

- BAT 6, monitoring diffuse VOCs to air from the entire site;
- BAT 49, to reduce VOCs from the storage of volatile liquid hydrocarbons; and
- BAT 51, to prevent/reduce emissions to soil and groundwater from the storage of liquid hydrocarbons.
- BAT 55 & BAT 56, emissions from flares and other sources

We therefore describe how we determined these issues in most detail in the relevant sections of this document.

5 Decision checklist regarding relevant BAT Conclusions

BAT Conclusions for the Refining of Mineral Oil and Gas, were published by the European Commission on 09 October 2014. There are 58 BAT Conclusions.

This section provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This section should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA Not Applicable
CC Currently Compliant
FC Compliant in the future (within 4 years of publication of BAT Conclusions)
NC Not Compliant
PC Partially Compliant

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
General				
1	**In order to improve the overall environmental performance of the plants for the refining of mineral oil and gas, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features:** i. commitment of the management, including senior management; ii. definition of an environmental policy that includes the continuous improvement of the installation by the management; iii. planning and establishing the necessary procedures, objectives and targets, in conjunction with financial planning and investment; iv. implementation of procedures (a) Structure and responsibility (b) Training (c) Communication (d) Employee involvement (e) Documentation (f) Efficient process control (g) Maintenance programmes (h) Emergency preparedness and response (i) Safeguarding compliance with environmental legislation v. checking performance and taking corrective action, paying particular attention to: (a) monitoring and measurement (see also the Reference Document on the General Principles of Monitoring) (b) corrective and preventive action (c) maintenance of records (d) independent (where practicable) internal and external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained; vi. review of the EMS and its continuing suitability, adequacy and effectiveness by senior management; vii. following the development of cleaner technologies; viii. consideration for the environmental impacts from the eventual decommissioning of the installation at the stage of designing a new plant, and throughout its operating life; viii. consideration for the environmental impacts from the eventual decommissioning of the installation at the stage of designing a new plant,	CC	The Operator has confirmed that all the features specified by the BAT Conclusion are incorporated into the existing Environmental Management System (EMS) which is externally certified to ISO14001. They provided references for each sub-paragraph and a copy of their ISO 14001:2004 Management System Certificate which is valid to 14 September 2018 (Certificate No: 10006191). We agree with the Operator's stated compliance of CC.	1.1

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>and throughout its operating life;
ix. application of sectoral benchmarking on a regular basis.

Applicability. The scope (e.g. level of detail) and nature of the EMS (e.g. standardised or non-standardised) will generally be related to the nature, scale and complexity of the installation, and the range of environmental impacts it may have.</td><td></td><td></td><td></td></tr>
<tr><td>2</td><td>In order to use energy efficiently, BAT is to use an appropriate combination of the techniques given below.

<table>
<tr><th>Technique</th><th>Description</th></tr>
<tr><td>i. Design techniques</td><td></td></tr>
<tr><td>a. Pinch analysis</td><td>Methodology based on a systematic calculation of thermodynamic targets for minimising energy consumption of processes. Used as a tool for the evaluation of total systems designs</td></tr>
<tr><td>b. Heat integration</td><td>Heat integration of process systems ensures that a substantial proportion of the heat required in various processes is provided by exchanging heat between streams to be heated and streams to be cooled</td></tr>
<tr><td>c. Heat and power recovery</td><td>Use of energy recovery devices e.g.
• waste heat boilers
• expanders/power recovery in the FCC unit
• use of waste heat in district heating</td></tr>
<tr><td>ii. Process control and maintenance techniques</td><td></td></tr>
<tr><td>a. Process optimisation</td><td>Process optimisation. Automated controlled combustion in order to lower the fuel consumption per tonne of feed processed, often combined with heat integration for improving furnace efficiency</td></tr>
<tr><td>b. Management and reduction of steam consumption</td><td>Management and reduction of steam consumption. Systematic mapping of drain valve systems in order to reduce steam consumption and optimise its use</td></tr>
<tr><td>c. Use of energy benchmarking</td><td>Use of energy benchmark. Participation in ranking and benchmarking activities in order to</td></tr>
</table></td><td>CC</td><td>The Operator has confirmed that an appropriate mixture of techniques are used to ensure energy is used efficiently.

Only six techniques are reported as being applicable to the facility.

Process optimisation has been carried out with identification of computer dynamic modelling, and a programme is underway to establish optimum operational envelopes for the various plant. The operational envelopes are used to enable decisions on the best combination of compression and dew-pointing for the incoming gas streams to meet processed gas out-put specifications and minimise energy consumption and cost. The Operator will review how to incorporate into a decision matrix process once complete.

Three out of the eight techniques are used.
i
a) Pinch analysis is incorporated into design when appropriate.
b) Heat integration with existing heat exchangers in dew pointing system.
Heat exchangers included in new Joules-Thompson system, replacing existing heat exchangers in MEG system.
Condensate/condensate heat exchangers on condensate stabilisation.</td><td>1.2</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr>
<td></td>
<td>
<table>
<tr><td></td><td>achieve continuous improvement by learning from best practice</td></tr>
<tr><td colspan="2">iii. Energy efficient production techniques and description</td></tr>
<tr><td>a. Use of combined heat and power.</td><td>System designed for the co-production (or the cogeneration) of heat (e.g. steam) and electric power from the same fuel</td></tr>
<tr><td>b. Integrated gasification combined cycle (IGCC).</td><td>Technique whose purpose is to produce steam, hydrogen (optional) and electric power from a variety of fuel types (e.g. heavy fuel oil or coke) with a high conversion efficiency</td></tr>
</table>
</td>
<td></td>
<td>Heat recovery included in methanol distillation design, specifically to reduce electricity consumption.

ii

c) Specific energy consumption is calculated and reviewed annually.

ISO 50001 is not used at Dimlington; however energy efficiency is an important consideration at the design and operational phase of the installation.

An ESOS assessment was carried out in 2015 and the most recent four yearly energy efficiency review was performed in 2017.

We agree with the Operator’s stated compliance of CC.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>In order to prevent or, where that is not practicable, to reduce dust emissions from the storage and handling of dusty materials, BAT is to use one or a combination of the techniques given below:
i. store bulk powder materials in enclosed silos equipped with a dust abatement system (e.g. fabric filter);
ii. store fine materials in enclosed containers or sealed bags;
iii. keep stockpiles of coarse dusty material wetted, stabilise the surface with crusting agents, or store under cover in stockpiles;
iv. use road cleaning vehicles</td>
<td>NA</td>
<td>The Operator confirms that no fine/dusty bulk powder materials are used in the process.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td>
<td>NA</td>
</tr>
<tr>
<td>4</td>
<td>BAT is to monitor emissions to air by using the monitoring techniques with at least the minimum frequency given below and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.
<table>
<tr><th>Description</th><th>Unit</th><th>Minimum frequency</th><th>Monitoring technique</th></tr>
<tr><td>SO_x, NO_x and dust emissions</td><td>Catalytic cracking</td><td>continuous</td><td>Direct measurement</td></tr>
</table>
</td>
<td>NA</td>
<td>The Operator confirms that the requirements are not applicable to the plant under review in this assessment.

i SOx, NOx and dust

- Catalytic cracking is not applicable to gas refineries.

- There are no combustion units > 100 MW

- Combustion units 50 to 100 MW - Two gas</td>
<td>NA</td>
</tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement				Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
		Combustion units ≥ 100MW ([3]) and calcining units	continuous	Direct measurement ([4])		**turbines RB211 fired with <u>sales quality natural gas</u> (large combustion plant-LCP) each at 80.3 MW thermal input, which are not included in this assessment as they have been the subject of a recent Regulation 60 notice to implement the requirements of Chapter III of the IED.** - Combustion units <50 MW - With the exception of the Thermox unit for waste gas treatment (a 0.63 MW rated thermal input burning refinery gas which can be fired with sales quality natural gas), all the small combustion plant included under the current EPR permit are no longer in use. Due to its small size (<20 MW), we will not require monitoring of the Thermox unit. Regular monitoring of the Thermox unit is however conducted internally to maintain combustion efficiency. The silica gel heater was removed from use in November 2017. - No SRUs. ii NH_3 emissions - No SCR/SNCR iii CO emissions - There are no combustion units > 100 MW - This does not apply to the LCPs, see above. The current permit requires monitoring to be undertaken at least every 6 months. iv Metal emissions	
		Combustion units of 50 to 100 MW ([3])	continuous	Direct measurement or indirect monitoring			
		Combustion units < 50 MW ([3])	once a year and after significant fuel changes	Direct measurement or indirect monitoring			
		Sulphur recovery units (SRU)	continuous for SO2 only	Direct measurement or indirect monitoring ([6])			
	NH_3 emissions	All units equipped with SCR or SNCR	continuous	Direct measurement			
	CO emissions	Catalytic Cracking and combustion units >= 100MW ([3])	continuous	Direct measurement			
		Other combustion units	once every 6 months ([5])	Direct measurement			
	Metal emissions: Nickel (Ni) Antimony (Sb) Vanadium (V)	Catalytic cracking	once every 6 months and after significant changes to the unit ([5])	Direct measurement or analysis based on metals content in the catalyst fines and in the fuel			
		Combustion units ([8])					

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	Polychlorinated dibenzodioxins / furans (PCDD/F) emissions | Catalytic reformer | once a year or once a regeneration, whichever is longer | Direct measurement (1) Continuous measurement of SO2 emissions may be replaced by calculations based on measurements of the sulphur content of the fuel or the feed; where it can be demonstrated that this leads to an equivalent level of accuracy (2) Regarding SO_x, only SO_2 is continuously measured while SO_3 is only periodically measured (e.g. during calibration of the SO_2 monitoring system) (3) Refers to the total rated thermal input of all combustion units connected to the stack where emissions occur. (4) Or indirect monitoring of SO_x (5) Monitoring frequencies may be adapted if, after a period of one year, the data series clearly demonstrate a sufficient stability. (6) SO_2 emissions measurements from SRU may be replaced by continuous material balance or other relevant process parameter monitoring, provided appropriate measurements of SRU efficiency are based on periodic (e.g. once every 2 years) plant performance tests. (7) Antimony (Sb) is monitored only in catalytic cracking units when Sb injection is used in the process (e.g. for metals passivation) (8) With the exception of combustion units firing only gaseous fuel		- Catalytic cracking is not applicable to gas refineries. - Not applicable to combustion units firing only gaseous fuels. v Dioxin and furan emissions - Not applicable to gas refineries. - **This BAT Conclusion is not applicable to the two LCPs (RB211 gas turbines) as they are fired on sales quality natural gas.** It would be applicable if they were fired on refinery fuel gas (RFG). For these LCP units between 50 and 100 MW periodic monitoring is undertaken as specified in Chapter III of the IED. Regarding the '**sales quality natural gas**', this is clearly set out in the 'Scope' section of the BAT Conclusions which states that: Combustion units for energy production means combustion units burning refinery fuels, **excluding units using only conventional or commercial fuels.** We agree with the Operator's stated compliance of NA.	
5	**BAT is to monitor the relevant process parameters linked to pollutant emissions, at catalytic cracking and combustion units by using appropriate techniques and with at least the frequency given below.** **Description** | **Minimum frequency**	NA	The Operator confirms that this BAT is not applicable to the units included in this assessment. The two LCPs (RB211 gas turbines) are fired on sales quality natural gas and have recently been the subject of a Regulation 60 notice (LCP) notification under Chapter III of the IED.	NA

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	Monitoring of parameters linked to pollution emissions, e.g. O_2 content in flue-gas, N and S content in fuel or feed ([1]) — Continuous for O_2 content. For N and S content, periodic at a frequency based on significant fuel/feed changes. [1] N and S monitoring in fuel or feed may not be necessary when continuous emission measurement of NO_x and SO_2 are carried out at the stack.		They note that periodic monitoring of oxygen at these units is undertaken. See BAT 4 above for details of the other units. Even if it was applicable, we would not require continuous oxygen monitoring where periodic monitoring is undertaken in accordance with the IED Chapter III Protocol. We have retained the periodic measurement set in accordance with Chapter III of the IED. **This BAT Conclusion is not applicable to the two LCPs (RB211 gas turbines) as they are fired on sales quality natural gas,** see BAT 4 above**.** It would be applicable if they were fired on refinery fuel gas (RFG). We agree with the Operator's stated compliance of NA.	
6	**BAT is to monitor diffuse VOC emissions to air from the entire site by using all of the following techniques:** i. sniffing methods associated with correlation curves for key equipment; ii. optical gas imaging techniques; iii. calculations of chronic emissions based on emissions factors periodically (e.g. once every two years) validated by measurements. The screening and quantification of site emissions by periodic campaigns with optical absorption-based-techniques, such as differential absorption light detection and ranging (DIAL) or solar occultation flux (SOF) is a useful complementary technique. **Description**. See section 1.20.6, Annex 1.	CC	The Operator confirmed that surveys carried out in 2009 and 2011 remain relevant for current operations. Changes to site processes have not altered VOC fugitive emissions, sources or rates. i Sniffing methods - A comprehensive site wide sniffing programme was undertaken pre- 2009 supported by calculation of emissions rates based on correlation curve reference data for specific component types. The sniffing survey covered >90% of key components (valves/flanges etc.) on site. The survey was backed up by smaller plant surveys the following year and a site wide DIAL study was completed in 2011 which corroborated the earlier sniffer based programme in confirming the significant VOC emissions/sources and	3.2.1

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
			quantification of emissions. ii Optical gas imaging - Site wide DIAL study completed 2011 identifying significant VOC emissions/sources at plant level and quantification of emissions. The DIAL technique was used as an equivalent measure to OGI and was required and approved by the Environment Agency compliance officer as appropriate for the site. iii Calculation - Fugitive emissions estimates are reported to us annually based on earlier sniffer study measurements and calibration factors. We don't agree that the Operator is fully compliant. The study was completed some time ago with no periodic campaigns undertaken since. We have set an improvement condition which is applicable to gas refineries that have hydrocarbon streams that vent to atmosphere. This will require the Operator to prepare a plan based on the risks from individual sources.	
7	**In order to prevent or reduce emissions to air, BAT is to operate the acid gas removal units, sulphur recovery units and all other waste gas treatment systems with a high availability and at optimal capacity.** Special procedures can be defined for other than normal operating conditions, in particular: i. During start-up and shut-down operations. ii. during other circumstances that could affect the proper functioning of the systems (e.g. regular and extraordinary maintenance work and cleaning operations of the units and/or of the waste gas treatment system); iii. in case of insufficient waste gas flow or temperature which prevents the use of the waste gas treatment system at full capacity.	CC	The Operator confirms that there is no sulphur recovery/acid gas recovery. Gases from the methanol distillation unit (MDU) overheads and methanol storage are routed to the Thermox unit for thermal oxidation of VOCs. Glycol reboilers were decommissioned in 2016 - no longer in use and will not be used in future. i Available except during maintenance periods. ii The permit allows the vent of waste gases if the Thermox unit is unavailable. This is allowed for a maximum of 12 hours per use (twice per year). The	2.3.1

<table>
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<tr><td></td><td></td><td></td><td>reliability of the unit has been 99.9% since commissioning in 2006.

iii System designed for high reliability, currently at 99.9%.

We agree with the Operator’s stated compliance of CC.</td><td></td></tr>
<tr><td>8</td><td>In order to prevent and reduce ammonia (NH_3) emissions to air when applying selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) techniques, BAT is to maintain suitable operating conditions of the SCR or SNCR waste gas treatment systems, with the aim of limiting emissions of unreacted NH_3.

Table 2 BAT- associated emission levels for ammonia (NH_3) emissions to air for a combustion process unit where SCR or SNCR techniques are used.

<table><tr><th>Parameter</th><th>BAT-AEL (monthly average mg/m^3)</th></tr><tr><td>Ammonia expressed as NH_3</td><td><5 - 15mg/Nm^3 (1) (2)</td></tr><tr><td colspan="2">(1) the higher end of the range is associated with higher inlet NO_X concentrations, higher NO_X reduction rates and the ageing of the catalyst
(2) The lower end of the range is associated with the use of the SCR technique.</td></tr></table></td><td>NA</td><td>The Operator confirms that there are no catalytic reduction techniques.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>N/A</td></tr>
<tr><td>9</td><td>In order to prevent and reduce emissions to air when using a sour water steam stripping unit, BAT is to route the acid off-gases from this unit to an SRU or any equivalent gas treatment system.

It is not BAT to directly incinerate the untreated sour water stripping gases.</td><td>NA</td><td>The Operator confirms that there is no sour gas.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
<tr><td>10</td><td>BAT is to monitor emissions to water by using the monitoring techniques with at least the frequency given in Table 3 (as below) and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international</td><td>CC</td><td>The Operator confirms that no process waters are discharged at the facility.

Uncontaminated surface waters from non-process</td><td>3.5.1</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr>
<td></td>
<td>
standards that ensure the provision of data of an equivalent scientific quality.

Table 3 BAT – associated emission levels for direct waste water discharges from the refining of mineral oil and gas monitoring frequencies associated with BAT (1)

<table>
<tr><th>Parameter</th><th>Unit</th><th>BAT – AEL (yearly average)</th><th>Monitoring (2) frequency and analytical method (standard)</th></tr>
<tr><td>Hydrocarbon oil index (HOI)</td><td>mg/l</td><td>0.1 – 2.5</td><td>Daily
EN 9377-2</td></tr>
<tr><td>Total suspended solids (TSS)</td><td>mg/l</td><td>5 - 25</td><td>Daily</td></tr>
<tr><td>Chemical oxygen demand (COD) (4)</td><td>mg/l</td><td>30 - 125</td><td>Daily</td></tr>
<tr><td>BOD 5</td><td>mg/l</td><td>No BAT - AEL</td><td>Weekly</td></tr>
<tr><td>Total nitrogen (5) expressed as N</td><td>mg/l</td><td>1 – 25 (6)</td><td>Daily</td></tr>
<tr><td>Lead, expressed as Pb</td><td>mg/l</td><td>0.005 – 0.030</td><td>Quarterly</td></tr>
<tr><td>Cadmium expressed as Cd</td><td>mg/l</td><td>0.002 – 0.008</td><td>Quarterly</td></tr>
<tr><td>Nickel, expressed as Ni</td><td>mg/l</td><td>0.005 – 0.100</td><td>Quarterly</td></tr>
<tr><td>Mercury, expressed as Hg</td><td>mg/l</td><td>0.0001 – 0.001</td><td>Quarterly</td></tr>
<tr><td>Vanadium</td><td>mg/l</td><td>No BAT - AEL</td><td>Quarterly</td></tr>
<tr><td>Phenol index</td><td>mg/l</td><td>No BAT - AEL</td><td>Monthly
EN 14402</td></tr>
<tr><td>Benzene, toluene, ethyl benzene, xylene (BTEX)</td><td>mg/l</td><td>Benzene 0.001 – 0.050
No BAT – AEL for T, E, X</td><td>Monthly</td></tr>
<tr><td colspan="4">(1) Not all parameters and sampling frequencies are applicable to effluent from gas refining sites</td></tr>
</table>
</td>
<td></td>
<td>areas are discharged to fire water ponds for reuse as fire water or discharge to field ditches and ultimately to the Humber Estuary directly from the fire water pond. The permit does not require these waters to be sampled before release to the environment.

Process/contaminated waters are diverted to a storage tank (Tank T-06) for collection as a waste for off-site disposal.

We note that variation EPR/PP3237CR/V004 authorised process waters to be pumped to the Easington site via a low pressure line, prior to transport off-shore via a high pressure line (emission point W3) and re-injected into gas reservoirs. The Operator is required to report to the offshore regulator (the Department for Business, Energy & Industrial Strategy BEIS, formerly DECC) the mass of water and the mass of oil re-injected into the reservoir.

As there are no direct emissions to water we conclude that this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td>
<td></td>
</tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>(2) Refers to a flow-proportional composite sample taken over period of 24 hours, or provided that sufficient flow stability is demonstrated, a time-proportional sample
(3) Moving from the current method to EN 9377-2 may require an adaptation period
(4) Where on-site correlation is available, COD may be replaced by TOC. The correlation between COD and TOC should be elaborated on a case-by-case basis. TOC monitoring would be the preferred option because it does not rely on the use of very toxic compounds
(5) Where total-nitrogen is the sum of the total Kjedahl nitrogen (TKN), nitrates and nitrites
(6) When nitrification/denitrification is used, levels below 15 mg/l can be achieved</td><td></td><td></td><td></td></tr>
<tr><td>11</td><td>In order to reduce water consumption and the volume of contaminated water, BAT is to use all of the techniques given below.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. water stream integration</td><td>Reduction of process water produced at the unit level prior to discharge by the internal reuse of water streams from e.g. cooling, condensates, especially for use in crude desalting</td><td>Generally applicable for new units. For existing units, applicability may require a complete rebuilding of the unit or the installation</td></tr><tr><td>ii. water and drainage system for segregation of contaminated water streams</td><td>Design of an industrial site to optimise water management, where each stream is treated as appropriate, by e.g. routing generated sour water (from distillation, cracking, coking units, etc.) to appropriate pre-treatment, such as a stripping unit</td><td>Generally applicable for new units. For existing units, applicability may require a complete rebuilding of the unit or the installation</td></tr><tr><td>iii. segregation of non-contaminated</td><td>Design of a site in order to avoid sending non-contaminated water to</td><td>Generally applicable for new units. For existing units,</td></tr></table></td><td>CC</td><td>The Operator confirms that water streams receive appropriate treatment techniques based on their properties.

i No process waters are discharged by the facility. Process waters are not suitable for reuse on site. Any process waters are routed via the process drain system to the oily water tank (T-06) which has a capacity of 70,000 litres.

ii No on site treatment of waste water streams. Surface water from process areas and bunds is visually checked before discharge to the fire water pond. No sour water, wash waters processed via waste water treatment and discharged to sea, or sent for off-site treatment.

iii Potentially contaminated liquids (rainfall/spills falling on process areas, slug-catchers, bunds) collected and are tested and routed to the drainage tank T-06 for off-site disposal, or discharge to fire water ponds following testing.</td><td>1.3.1</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td>water streams (e.g. once-through cooling, rain water)</td><td>general waste water treatment and to have a separate release after possible reuse for this type of stream</td><td>applicability may require a complete rebuilding of the unit or the installation</td></tr>
<tr><td>iv. prevention of spillages and leaks</td><td>Practices that include the utilisation of special procedures and/or temporary equipment to maintain performances when necessary to manage special circumstances such as spills, loss of containment, etc</td><td>Generally applicable</td></tr>
</table>
</td><td></td><td>iv Procedure "Workplace Environmental Standards - PUK-SMS-COM-006" describes storage, handling of materials, breaking containment loading etc. for minimisation of spills and techniques for clean-up.

We agree with the Operator’s stated compliance of CC.</td><td></td></tr>
<tr><td>12</td><td>In order to reduce the emission load of pollutants in the waste water discharge to the receiving water body, BAT is to remove insoluble and soluble polluting substances by using all of the techniques given below.
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Removal of insoluble substances by recovering oil</td><td>See Section 1.21.2, Annex 1.</td><td>Generally applicable</td></tr>
<tr><td>ii. Removal of insoluble substances by recovering suspended solids and dispersed oil</td><td>See Section 1.21.2, Annex 1.</td><td>Generally applicable</td></tr>
<tr><td>iii. Removal of insoluble substances including biological treatment and clarification.</td><td>See Section 1.21.2, Annex 1.</td><td>Generally applicable</td></tr>
</table>
BAT – associated emission levels – see Table 3</td><td>PC</td><td>The Operator confirms that only the fire water pond discharges to surface water. The fire water pond receives site surface water run-off from uncontaminated areas. Outlined below are the methods to control the quality of water in the fire water pond and to minimise pollutants in process waters being tankered off-site for treatment.

Currently the only bund water collected is from the bunds surrounding the hydrocarbon/condensate tanks. Contamination of this bund water would be visible as an oil sheen and contaminated bund water would be collected for off-site treatment. Currently, uncontaminated bund water is released to the fire water pond after visual inspection. When the methanol distillation unit is operational, bund waters/surface run-off may be potentially contaminated with soluble hydrocarbon and chemical testing of the water (COD) will then be performed as well as visual inspection before water is routed to the fire water pond.

i Contaminated water awaiting off-site treatment is collected in Tank T-06 which has a skimmer pump that removes surface oils and condensates and feeds back</td><td>2.3.1</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
			into the condensate stabilisation system to minimise condensate losses and off-site treatment requirements. ii Water is pumped from the storm water pond through an aerated percolation filter to the firewater pond from which it is drained to surface water discharge. The percolation filter removes some suspended solids and dispersed oil. iii Surface water collected from uncontaminated areas of the site are stored in the storm water pond. They are passed through an aerated percolation filter which removes trace dissolved organics; there is the potential for clarification of water in the firewater pond before release to surface waters. We would not expect to see the range of treatment techniques for uncontaminated surface water discharges. The Operator has demonstrated that the necessary controls are in place to ensure that they do not become contaminated. Whilst the Operator's response refers to off-site treatment of contaminated waste waters, we note that variation EPR/PP3237CR/V004 authorised process waters to be pumped to the Easington site via a low pressure line, prior to transport off-shore via a high pressure line (emission point W3) and re-injected into gas reservoirs. We conclude that this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
13	**When further removal of organic substances or nitrogen is needed, BAT is to use an additional treatment step as described in Section 1.21.2 (see Annex 1).**	NA	The Operator confirms that there is no possibility of local eutrophication issues etc. given the limited discharge and location of the discharge. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
14	**In order to prevent or, where that is not practicable, to reduce waste generation, BAT is to adopt and implement a waste management plan that, in order of priority, ensures that waste is prepared for reuse, recycling, recovery or disposal.**	CC	The Operator confirms that there is a waste management procedure as part of the EMS, PUK-SMS-COM-012. Clause 4.1 of this procedure states that "The Environmental Advisor is responsible with the Waste Contractor for regularly reviewing the types of waste generated and planning their disposal routes taking account of the waste hierarchy – prevention, re-use, recycle, other use e.g. energy, disposal". Waste records show the total waste generated: 2013 – 3,636 tonnes 2014 – 3,479 tonnes and 2015 – 2,590 tonnes i.e. a decreasing trend. “The disposal/recovery split is: 2013/2014 - 1%/99% and 2015 - 13%/87% The reduction in recovered % is attributable to the method of classification of the produced water waste stream being changed by the contractor. We agree with the Operator’s stated compliance of CC.	1.4.1

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td>15</td><td>In order to reduce the amount of sludge to be treated or disposed of, BAT is to use one or a combination of the techniques given below.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i Sludge pretreatment</td><td>Prior to final treatment (e.g. in a fluidised bed incinerator), the sludges are dewatered and/or de-oiled (by e.g. centrifugal decanters of steam dryers) to reduce their volume and to recover oil from slop equipment.</td><td>Generally applicable</td></tr><tr><td>ii Reuse of sludge in process units</td><td>Certain types of sludge (e.g. oily sludge) can be processed in units (e.g. coking) as part of the feed due to their oil content.</td><td>Applicability is restricted to sludges that can fulfil the requirements to be processed in units with appropriate treatment</td></tr></table></td><td>NA</td><td>The Operator confirms that there is no sludge production on site aside from occasional condensate tank bottoms sludge which is removed from site as hazardous waste.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td>16</td><td>In order to reduce the generation of spent solid catalyst waste, BAT is to use one or a combination of the techniques given below.

<table><tr><th>Technique</th><th>Description</th></tr><tr><td>i. Spent solid catalyst management</td><td>Scheduled and safe handling of the materials used as catalyst (e.g. by contractors) in order to recover or reuse them in off-site facilities. These operations depend on the type of catalyst and process</td></tr><tr><td>ii. Removal of catalyst from slurry decant oil</td><td>Decanted oil sludge from process units (e.g. FCC unit) can contain significant concentrations of catalyst fines. These fines can be separated prior to the reuse of decant oil as a feedstock.</td></tr></table></td><td>NA</td><td>The Operator confirms that there is no solid catalytic treatment on site.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
17	**In order to prevent or reduce noise, BAT is to use one or a combination of the techniques given below:** i. Make an environmental noise assessment and formulate a noise management plan as appropriate to the local environment; ii. Enclose noisy equipment/operation in a separate structure/unit; iii. Use embankments to screen the source of noise; iv. Use noise protection walls;	CC	The Operator confirms that there is a noise management plan/code of practice applied to cover design, construction, operational and decommissioning phases. There are two noise embankments. Noise protection walls were deemed unnecessary based on other measures and the scale of potential noise emissions. i Latest noise study conducted in 2011; however there is a Bacton Code of Practice, the latest revision being 2014, which will become the standard code of practice for all assets. Annual noise management review, all improvements follow BAT principles. Noise Code of Practice applied at planning stage of a new project and in relation to on-going improvement to the existing environment in the vicinity of the terminal. ii Enclosure requirements are assessed at design stage for new equipment. iii A noise bund is located on the south of the site, with a second bund located to the south of the Langeled facilities. Both of these bunds are 5m high. iv Unnecessary due to already implemented control measures and scale of potential noise emissions. We agree with the Operator's stated compliance of CC.	3.4.1

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr>
<td>18</td>
<td>In order to prevent or reduce diffuse VOC emissions, BAT is to apply the techniques given below.
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>I. Techniques related to plant design.</td><td>i. Limiting the number of potential emission sources
ii. Maximising inherent process containment features
iii. Selecting high integrity equipment
iv. Facilitating monitoring and maintenance activities by ensuring access to potentially leaking components</td><td>Applicability may be limited for existing units</td></tr>
<tr><td>II. Techniques related to plant installation and commissioning</td><td>i. Well defined procedures for construction and assembly
ii. Robust commissioning and hand-over procedures to ensure that the plant is installed in line with the design requirements.</td><td>Applicability may be limited for existing units</td></tr>
<tr><td>III. Techniques related to plant operation</td><td>Use of a risk based leak detection and repair (LDAR) programme in order to identify leaking components, and to repair these leaks.
See table 1.20.6 under BAT 6</td><td>Generally applicable</td></tr>
</table>
</td>
<td>CC</td>
<td>The Operator confirms that as this is an existing facility, the techniques related to plant design are limited to plant changes. The EMS incorporates the design process as well as operations and requires risk and BAT assessment of proposed changes including Layers of Protection Analysis (LOPA).

EMS procedures include prevention of loss of containment during commissioning, decommissioning and normal operations. The Perenco Guidance on Certification (GOC) specifies requirements for checks against design during installation, commissioning and handover stages.

The Dimlington site has an existing Leak Detection and Repair (LDAR) programme. Leak minimisation is addressed through the Hydrocarbon Leak Reduction Policy including activities which are relevant to the installation and commissioning stage. The hydrocarbon release reduction procedure includes a leak search procedure to locate potential and actual leaks.

I This is an existing facility, hence the techniques related to plant design are limited to plant changes e.g. the recent Freon Replacement Project.
The Environmental Management System Procedure (PUK-SMS-COM-003) lists relevant documents for the EMS. For new projects there are procedures for: Project Management (PUK-SMS-PRJ-001) which covers management of projects including environmental risk assessment, and risk prevention control and mitigation measures; Inherently Safer Design process (PUK-SMS-RM-004) for hazard prevention and control in projects by safer design and Layers of Protection Analysis (LOPA) (PUK-SMS-RM-002). The EMS also refers to procedures to prevent loss of containment commissioning, decommissioning and operational stages i.e. Workplace Environmental Standards (PUK-</td>
<td>3.2.1</td>
</tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
			SMS-COM-006) In the Dimlington Freon Replacement Project: the New Methanol Distillation Unit vapours, methanol storage and tanker loading vapours will be normally vented to the Thermox unit. Low emission valve stem packings have been specified for control valves in process service. Manual valves have been selected with (Class A equivalent) fugitive emission certification by TUV in accordance with TA Luft VDI 2440. (BAT Report Oct 2014). II Leak minimisation is a key consideration in the commissioning phase of a project. The sites Guidance on Certification (GOC) procedures contain work packs which may include torque procedures where necessary. III The production job plan in work instruction tasks 10 and 20 instructs to complete the leak search in the allocated area and report any findings by referring to the "search procedure". The Hydrocarbon Leak Reduction Policy (PUK-SMS-OWC-036) includes the searching for and management of leaks (section 7.0) and vibration management (section 8.0). The Hydrocarbon Release Reduction procedure (UKCS-SOP-012) Addendum 2 Leak Searches include the procedure to locate potential or actual leaks. There is a monthly planned task (F188) to conduct an audit of the terminal leaks register. The Dimlington site has an existing LDAR programme that will be extended to cover the new facilities. We agree with the Operator's stated compliance of CC.	

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td>19</td><td>In order to prevent hydrofluoric acid (HF) emissions to air from the hydrofluoric acid alkylation process, BAT is to use wet scrubbing with alkaline solution to treat incondensable gas streams prior to venting to flare.

Description: See section 1.20.3, Annex 1.
Applicability: Generally applicable. Safety requirements, due to the hazardous nature of hydrofluoric acid, are to be considered.</td><td>NA</td><td>Hydrofluoric acid alkylation processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
<tr><td>20</td><td>In order to reduce emissions to water from the hydrofluoric acid alkylation process, BAT is to use a combination of the techniques given below.

<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Precipitation / Neutralisation step</td><td>Precipitation (with e.g. calcium or aluminium-based additives) or neutralisation (where the effluent is indirectly neutralised with potassium hydroxide (KOH))</td><td>Generally applicable. Safety requirements due to the hazardous nature of hydrofluoric acid (HF) are to be considered.</td></tr>
<tr><td>ii Separation step</td><td>The insoluble compounds produced at the first step (e.g. CaF_2 or AlF_3) are separated in e.g. settlement basin.</td><td>Generally applicable</td></tr>
</table>
</td><td>NA</td><td>Hydrofluoric acid alkylation processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
<tr><td>21</td><td>In order to reduce the emissions to water from the sulphuric acid alkylation process, BAT is to reduce the use of sulphuric acid by regenerating the spent acid and to neutralise the waste water generated by this process before routing to waste water treatment.</td><td>NA</td><td>Sulphuric acid alkylation processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
<tr><td>22</td><td>In order to prevent and reduce the emissions of hazardous substances to air and water from base oil production processes, BAT is to use one or a combination of the techniques given below.</td><td>NA</td><td>Base oil production processes are not part of the relevant activities carried out in the installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Closed process with a solvent recovery</td><td>Process where the solvent, after being used during base oil manufacturing (e.g. in extraction, dewaxing units), is recovered through distillation and stripping steps.
See Section 1.20.7, Annex 1.</td><td>Generally applicable</td></tr>
<tr><td>ii. Multi-effect extraction solvent-based process</td><td>Solvent extraction process including several stages of evaporation (e.g. double or triple effect) for a lower loss of containment</td><td>Generally applicable to new units. The use of a triple effect process may be restricted to non-fouling feed stocks</td></tr>
<tr><td>iii. Extraction unit processes using less hazardous substances</td><td>Design (new plants) or implement changes (into existing) so that the plant operates a solvent extraction process with the use of a less hazardous solvent: e.g. converting furfural or phenol extraction into the n-methylpyrrolidone (NMP) process</td><td>Generally applicable to new units. Converting existing units to another solvent-based process with different physico-chemical properties may require substantial modifications</td></tr>
<tr><td>iv. Catalytic processes based on hydrogenation</td><td>Processes based on conversion of undesired compounds via catalytic hydrogenation similar to hydrotreatment.</td><td>Generally applicable to new units</td></tr>
</table>
</td><td></td><td>This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td></td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td>23</td><td>In order to prevent and reduce emissions to air from the bitumen production process, BAT is to treat the gaseous overhead by using one of the techniques given below

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Thermal oxidation of gaseous overhead over 800 °C</td><td>See Section 1.20.6, Annex 1.</td><td>Generally applicable for the bitumen blowing unit</td></tr><tr><td>ii. Wet scrubbing of gaseous overhead</td><td>See Section 1.20.3, Annex 1.</td><td>Generally applicable for the bitumen blowing unit</td></tr></table></td><td>NA</td><td>Bitumen processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
<tr><td colspan="2">BAT conclusions for the fluid catalytic cracking process</td><td></td><td></td><td></td></tr>
<tr><td>24</td><td>In order to prevent or reduce NO_X emissions to air from the catalytic cracking process (regenerator), BAT is to use one or a combination of the techniques given below.

I. Primary or process-related techniques, such as:<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td colspan="3">Process optimisation and use of promoters or additives</td></tr><tr><td>i. Process optimisation</td><td>Combination of operating conditions or practices aimed at reducing NO_X formation, e.g. lowering the excess oxygen in the flue-gas in full combustion mode, air staging of the CO boiler in partial combustion mode, provided that the CO boiler is appropriately designed.</td><td>Generally applicable</td></tr></table></td><td>NA</td><td>Catalytic cracking processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	ii. Low-NO_X CO oxidation promoters — Use of a substance that selectively promotes the combustion of CO only and prevents the oxidation of the nitrogen that contain intermediates to NO_X e.g. non-platinum promoters. — Applicable only in full combustion mode for the substitution of platinum-based CO promoters. Appropriate distribution of air in the regenerator may be required to obtain the maximum benefits iii. Specific additive for NO_X reduction — Use of specific catalyst additives for enhancing the reduction of NO by CO — Applicable only in full combustion mode for the substitution of platinum-based CO promoters. Appropriate distribution of air in the regenerator may be required to obtain the maximum benefits. II Secondary or end-of-pipe techniques such as: **Technique** / **Description** / **Applicability** i. Selective catalytic reduction (SCR) — See section 1.20.2, Annex 1. — To avoid potential fouling downstream, additional firing might be required upstream of the SCR. For existing units, the applicability may be limited by space availability.			

BAT Conclusion Number	Summary of BAT Conclusion requirement			Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	ii. Selective non-catalytic reduction (SNCR)	See section 1.20.2, Annex 1.	For partial combustion FCCs with CO boilers, a sufficient residence time at the appropriate temperature is required. For full combustion FCCs without auxiliary boilers, additional fuel injection (e.g. hydrogen) may be required to match a lower temperature window.			
		See section 1.20.2, Annex 1.	Need for additional scrubbing capacity. Ozone generation and the associated risk management need to be properly addressed. The applicability may be limited by the need for additional waste water treatment and related cross-media effects (e.g. nitrate emissions) and by an insufficient supply of liquid oxygen (for ozone generation). The applicability of the technique may be limited by space availability.			

Table 4 BAT- associated emission levels for NO_X emissions to air from the regenerators in the catalytic cracking process

Parameter	Type of unit/combustion mode	BAT-AEL (monthly average) Mg/Nm^3
NO_X expressed as NO_2	New unit/all combustion mode	<30 – 100
	Existing unit/full combustion mode	<100 – 300 (1)

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td></td><td>Existing unit/partial combustion mode</td><td>100 - 400 (1)</td></tr>
<tr><td colspan="3">When antimony (Sb) injection is used for metal passivation, NO_X levels up to 700 mg/Nm^3 may occur. The lower end of the range can be achieved by using the SCR technique.</td></tr>
</table>
</td><td></td><td></td><td></td></tr>
<tr><td>25</td><td>In order to reduce dust and metals emissions to air from the catalytic cracking process (regenerator), BAT is to use one or a combination of the techniques given below.

I. Primary or process-related techniques, such as:
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Use of an attrition-resistant catalyst</td><td>Selection of catalyst substance that is able to resist abrasion and fragmentation in order to reduce dust emissions.</td><td>Generally applicable provided the activity and selectivity of the catalyst are sufficient</td></tr>
<tr><td>ii. Use of low sulphur feedstock (e.g. by feedstock selection or hydrotreatment of feed)</td><td>Feedstock selection favours low sulphur feedstocks among the possible sources. Hydrotreatment aims at reducing the sulphur, nitrogen and metal contents of the feed.</td><td>Requires sufficient availability of low sulphur feedstocks, hydrogen production and hydrogen sulphide (H2S) treatment capacity (e.g. amine and Claus units)</td></tr>
</table>
II. secondary or end-of-pipe techniques, such as:
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Electrostatic precipitator (ESP)</td><td>See section 1.20.1, Annex1.</td><td>For existing units, the applicability may be limited by space availability</td></tr>
<tr><td>ii. Multistage cyclone</td><td>See section 1.20.1,</td><td>Generally applicable</td></tr>
</table>
</td><td>NA</td><td>Catalytic cracking processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td>separators</td><td>Annex1.</td><td></td></tr>
<tr><td>iii. Third stage blowback filter</td><td>See section 1.20.1, Annex1.</td><td>Applicability may be restricted</td></tr>
<tr><td>iv. Wet scrubbing</td><td>See section 1.20.3, Annex1.</td><td>The applicability may be limited in arid areas and in the case where the by-products from treatment (including e.g. waste water with high level of salts) cannot be reused or appropriately disposed of. For existing units, the applicability may be limited by space availability.</td></tr>
</table>
Table 5 BAT – associated emission levels for dust emissions to air form the regenerator in the catalytic cracking process.
<table>
<tr><th>Parameter</th><th>Type of unit</th><th>BAT-AEL (monthly average) (1) Mg/Nm^3</th></tr>
<tr><td rowspan="2">Dust</td><td>New unit</td><td>10 – 25</td></tr>
<tr><td>Existing unit</td><td>10 – 50 (2)</td></tr>
<tr><td colspan="3">(1) Soot blowing in CO boiler and through the gas cooler is excluded
(2) The lower end of the range can be achieved with a 4-field ESP</td></tr>
</table>
The associated monitoring is in BAT 4.
</td><td></td><td></td><td></td></tr>
<tr><td>26</td><td>In order to prevent or reduce SO_X emissions to air from the catalytic cracking process (regenerator), BAT is to use one or a combination of the techniques given below.</td><td>NA</td><td>Catalytic cracking processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>I. Primary or process-related techniques such as:
<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Use of SO_X reducing catalyst additives</td><td>Use of a substance that transfers the sulphur associated with coke from the regenerator back to the reactor.</td><td>Applicability may be restricted by regenerator conditions design. Requires appropriate hydrogen sulphide abatement capacity (e.g. SRU)</td></tr><tr><td>ii. Use of low sulphur feedstock (e.g. by feedstock selection of by hydrotreatment of the feed)</td><td>Feedstock section favours low sulphur feedstocks among the possible sources to be processed at the unit. Hydrotreatment aims at reducing the sulphur, nitrogen and metal contents of the feed. Section 1.20.3, Annex1</td><td>Requires sufficient availability of low sulphur feedstocks, hydrogen production and hydrogen sulphide (H_2S) treatment capacity (e.g. amine and Claus units)</td></tr></table>
II. Secondary or end-of pipe techniques, such as:
<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Non-regenerative scrubbing</td><td>Wet scrubbing or seawater scrubbing</td><td>The applicability may be limited in arid areas and in the case where the by-products form the treatment (including e.g. waste water with high levels of salts) cannot be reused or appropriately disposed of.</td></tr></table></td><td></td><td>activities carried out at this installation.</td><td></td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td>ii. Regenerative scrubbing</td><td>Use of a specific SO_X absorbing reagent (e.g. absorbing solution) which generally enables the recovery of sulphur as a by-product during a regenerating cycle where the reagent is reused
Section 1.20.3, Annex1</td><td>The applicability is limited to the case where regenerated by-products can be sold. For existing units, the applicability may be limited by the existing sulphur recovery capacity as well as by space availability</td></tr>
</table>

Table 6 BAT-associated emission levels for SO_2 emissions to air from the regenerator in the catalytic cracking process
<table>
<tr><th>Parameter</th><th>Type of units/mode</th><th>BAT-AEL (monthly average) mg/Nm^3</th></tr>
<tr><td rowspan="3">SO_2</td><td>New units</td><td>≤ 300</td></tr>
<tr><td>Existing units/full combustion</td><td><100 – 800(1)</td></tr>
<tr><td>Existing units/partial combustion</td><td>100 – 1 200 (1)</td></tr>
<tr><td colspan="3">(1) Where selection of low sulphur (e.g. < 0.5% w/w) feed (or hydrotreatment) and/or scrubbing is applicable, for all combustion modes, the upper end of the BAT-AEL range is ≤600 mg/Nm^3</td></tr>
</table>

The associated monitoring is in BAT 4.</td><td></td><td></td><td></td></tr>
<tr><td>27</td><td>In order to reduce carbon monoxide (CO) emissions to air from the catalytic cracking process (regenerator), BAT is to use one or a combination of the techniques given below.
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
</table></td><td>NA</td><td>Catalytic cracking processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td>i. Combustion operation control</td><td>See section 1.20.5, Annex 1.</td><td>Generally applicable</td></tr>
<tr><td>ii. Catalysts with carbon monoxide (CO) oxidation promoters</td><td>See section 1.20.5, Annex 1.</td><td>Generally applicable only for full combustion mode</td></tr>
<tr><td>iii. Carbon monoxide (CO) boiler</td><td>See section 1.20.5, Annex 1.</td><td>Generally applicable only for partial combustion mode</td></tr>
</table>
Table 7 BAT- associated emission levels for carbon monoxide emissions to air from the regenerator in the catalytic cracking process for partial combustion mode.
<table>
<tr><th>Parameter</th><th>Combustion mode</th><th>BAT-AEL (monthly average) mg/Nm3</th></tr>
<tr><td>Carbon monoxide expressed as CO</td><td>Partial combustion mode</td><td>≤ 100 (1)</td></tr>
<tr><td colspan="3">(1) May not be achievable when not operating the CO boiler at full load.</td></tr>
</table>
The associated monitoring is in BAT 4
</td><td></td><td></td><td></td></tr>
<tr><td>28</td><td>
In order to reduce emissions of polychlorinated dibenzodioxins/furans (PCDD/F) to air from the catalytic reforming unit, BAT is to use one or a combination of the techniques given below
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Choice of the catalyst promoter</td><td>Use of catalyst promoter in order to minimise polychlorinated dibenzodioxins/furans (PCDD/F) formation during regeneration. See section 1.20.7, Annex 1.</td><td>Generally applicable</td></tr>
</table>
</td><td>NA</td><td>Catalytic cracking processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td colspan="3">ii Treatment of the regeneration flue-gas</td></tr>
<tr><td>a) Regeneration gas recycling loop with adsorption bed</td><td>Waste gas from the regeneration step is treated to remove chlorinated compounds (e.g. dioxins)</td><td>Generally applicable to new units. For existing units the applicability may depend of the current regeneration unit design</td></tr>
<tr><td>b) Wet scrubbing</td><td>See section 1.20.3, Annex 1.</td><td>Not applicable to semi-regenerative reformers</td></tr>
<tr><td>c) Electrostatic precipitator (ESP)</td><td>See section 1.20.1, Annex 1.</td><td>Not applicable to semi-regenerative reformers</td></tr>
</table>
</td><td></td><td></td><td></td></tr>
<tr><td>29</td><td>In order to reduce emissions to air from the coking production processes, BAT is to use one or a combination of the techniques given below:
<table>
<tr><th>Applicability</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Collection and recycling of coke fines</td><td>Systematic collection and recycling of coke fines generated during the whole coking process (drilling, handling, crushing, cooling etc.)</td><td>Generally applicable</td></tr>
<tr><td>ii. Handling and storage of coke according to BAT 3</td><td>See BAT 3</td><td>Generally applicable</td></tr>
<tr><td>iii. Use of a closed blow down system</td><td>Arrestment system for pressure relief from the coke drum</td><td>Generally applicable</td></tr>
<tr><td>iv. Recovery of gas (including the venting prior to the drum being opened</td><td>Carrying venting from the coke drum to the gas compressor to recover as RFG</td><td>For existing units, the applicability of the techniques may be limited by space</td></tr>
</table>
</td><td>NA</td><td>Coking production processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	<table><tr><td>to atmosphere) as a component of refiner fuel gas (RFG)</td><td>rather than flaring. For the flexi coking process, a conversion step (to convert the carbonyl sulphide (COS) into S_2S) is needed prior to treating the gas from the coking unit.</td><td>availability</td></tr></table>			
30	**In order to reduce NO_X emissions to air from the calcining of green coke process, BAT is to use selective non-catalytic reduction (SNCR).** **Description**: See section 1.20.2, Annex 1. **Applicability:** The applicability of the SNCR technique (especially with respect to residence time and temperature window) may be restricted due to the specificity of the calcining process.	NA	Calcining processes are not part of the relevant activities carried out in the installation. This BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
31	**In order to reduce SO_X emissions to air from the calcining of green coke process, BAT is to use one or a combination of the techniques given below.** <table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Non-regenerative scrubbing</td><td>Wet scrubbing or seawater scrubbing. See Section 5.20.3</td><td>The applicability may be limited in arid areas and in the case where the by-products from treatment (including e.g. waste water with high level of salts) cannot be reused or appropriately disposed of. For existing units, the applicability may be limited by space availability</td></tr><tr><td>ii. Regenerative</td><td>Use of a specific SO_X absorbing reagent</td><td>The applicability is limited to the case where</td></tr></table>	NA	Calcining processes are not part of the relevant activities carried out in the installation. This BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
<table>
<tr><td>scrubbing</td><td>(e.g. absorbing solution) which generally enables the recovery of sulphur as a by-product during a regenerating cycle where the reagent is reused. See Section 5.20.3, Annex 1.</td><td>regenerated by-products can be sold.
For existing units, the applicability may be limited by the existing sulphur recovery capacity as well as by space availability</td></tr>
</table>
</td><td></td><td></td><td></td></tr>
<tr><td>32</td><td>
In order to reduce dust emissions to air from the calcining of green coke process, BAT is to use a combination of the techniques given below.
<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>i. Electrostatic precipitator (ESP)</td><td>See section 1.20.1, Annex 1.</td><td>For existing units, the applicability may be limited by space availability.
For graphite and anode coke calcining production, the applicability may be restricted due to the high resistivity of the coke particles</td></tr>
<tr><td>ii. Multistage cyclone separators</td><td>See section 1.20.1, Annex 1.</td><td>Generally applicable</td></tr>
</table>
Table 8 BAT- associated emission levels of dust emissions to air from a unit for the calcining of green coke
<table>
<tr><th>Parameter</th><td>BAT-AEL (monthly average) mg/Nm^3</td></tr>
<tr><td>Dust</td><td>10 - 50 ([1, 2])</td></tr>
<tr><td colspan="2">(1) The lower end of the range can be achieved with a 4-field ESP</td></tr>
</table>
</td><td>NA</td><td>Calcining processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>(2) When an ESP is not applicable, values of up to 150 mg/Nm^3 may occur.

The associated monitoring is in BAT 4.</td><td></td><td></td><td></td></tr>
<tr><td>33</td><td>In order to reduce water consumption and emissions to water from the desalting process, BAT is to use one or a combination of the techniques given below.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Recycling water and optimisation of the desalting process</td><td>An ensemble of good desalting practices aiming at increasing the efficiency of the desalter and reducing wash water usage e.g. using low shear mixing devices, low water pressure. It includes the management of key parameters for washing (e.g. good mixing) and separation (e.g. pH, density, viscosity, electric field potential for coalescence) steps</td><td>Generally applicable</td></tr><tr><td>ii. Multistage desalter</td><td>Multistage desalters operate with water addition and dehydration, repeated through two stages or more for achieving a better efficiency in the separation and therefore less corrosion in further processes</td><td>Applicable for new units</td></tr><tr><td>iii. Additional separation step</td><td>An additional enhanced oil/water and solid/water separation designed for reducing the charge of oil to the waste water treatment plant and recycling it to the process. This includes, e.g. settling drum, the use of optimum interface level controllers</td><td>Generally applicable</td></tr></table></td><td>NA</td><td>Desalting processes are not part of the relevant activities carried out in the installation.

This BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>34</td><td>BAT 34. In order to prevent or reduce NO_X emissions to air from the combustion units, BAT is to use one or a combination of the techniques given below.

I. Primary or process-related techniques, such as:

<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td colspan="3">i. Selection or treatment of fuel</td></tr>
<tr><td>(a) Use of gas to replace liquid fuel</td><td>Gas generally contains less nitrogen than liquid and its combustion leads to a lower level of NO_X emissions.
See section 1.20.3, Annex 1.</td><td>The applicability may be limited by the constraints associated with the availability of low sulphur gas fuels, which may be impacted by the energy policy of the Member State</td></tr>
<tr><td>(b) Use of low nitrogen refinery fuel oil (RFO) e.g. by RFO selection or by hydrotreatment of RFO</td><td>Refinery fuel oil selection favours low nitrogen liquid fuels among the possible sources to be used at the unit. Hydrotreatment aims at reducing the sulphur, nitrogen and metal contents of the fuel.
See section 1.20.3, Annex 1.</td><td>Applicability is limited by the availability of low nitrogen liquid fuels, hydrogen production and hydrogen sulphide (H_2S) treatment capacity (e.g. amine and Claus units)</td></tr>
<tr><td colspan="3">ii. Combustion modifications</td></tr>
<tr><td>(a) Staged combustion:</td><td>See section 1.20.2, Annex 1.</td><td>Fuel staging for mixed or liquid firing may</td></tr>
</table>
</td><td>NA</td><td>The Operator confirms that the requirements of BAT 34 are not applicable.

This BAT Conclusion only applies to units that burn RFG, which is not applicable to this facility, see BAT Conclusion 4 above.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement			Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	• air staging • fuel staging		require a specific burner design			
	(b) Optimisation of combustion	See section 1.20.2, Annex 1.	Generally applicable			
	(c) Flue-gas recirculation	See section 1.20.2, Annex 1.	Applicable through the use of specific burners with internal recirculation of the flue-gas. The applicability may be restricted to retrofitting external flue-gas recirculation to units with a forced/induced draught mode of operation			
	(d) Diluent injection	See section 1.20.2, Annex 1.	Applicable for gas turbines where appropriate inert diluents are available			
	(e) Use of low-NO_X burners (LNB)	See section 1.20.2, Annex 1.	Generally applicable for new units taking into account, the fuel-specific limitation (e.g. for heavy oil). For existing units, applicability may be restricted by the complexity caused by site-specific conditions e.g. furnaces design, surrounding devices. In very specific cases, substantial modifications may be required. The applicability may be restricted for furnaces in			

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)

		the delayed coking process, due to possible coke generation in the furnaces. In gas turbines, the applicability is restricted to low hydrogen content fuels (generally < 10 %)

II. Secondary or end-of-pipe techniques, such as:

Technique	Description	Applicability
i. Selective catalytic reduction (SCR)	See section 1.20.2, Annex 1.	Generally applicable for new units. For existing units, the applicability may be constrained due to the requirements for significant space and optimal reactant injection
ii. Selective non-catalytic reduction (SNCR)	See section 1.20.2, Annex 1.	Generally applicable for new units. For existing units, the applicability may be constrained by the requirement for the temperature window and the residence time to be reached by reactant injection
iii. Low temperature oxidation	See section 1.20.2, Annex 1.	The applicability may be limited by the need for additional scrubbing capacity and by the fact that ozone generation and the associated risk

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)

		management need to be properly addressed. The applicability may be limited by the need for additional waste water treatment and related cross-media effects (e.g. nitrate emissions) and by an insufficient supply of liquid oxygen (for ozone generation). For existing units, the applicability of the technique may be limited by space availability
iv. SNO_X combined technique	See section 1.20.4, Annex 1.	Applicable only for high flue-gas (e.g. > 800 000 Nm3/h) flow and when combined NO_X and SO_X abatement is needed

BAT- associated emission levels: See Table 9, Table 10 and Table 11

Table 9 BAT-associated emission levels for NO_X emissions to air from a gas turbine

Parameter	Type of equipment	BAT-AEL (1) (monthly average) mg/Nm³ at 15% O_2
NOx, expressed as NO_2	Gas turbine (including combined cycle gas turbine – CCGT) and integrated gasification combined cycle turbine (IGCC))	40 - 120 (existing gas turbine)
		20 - 50 (new turbine) (2)

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>
(1) BAT-AEL refers to combined emissions from the gas turbine and the supplementary firing recovery boiler, where present
(2) For fuel with high H_2 content (i.e. above 10%), the upper end of the range is 75 mg/Nm^3

Table 10 BAT- associated emission levels for NOX emissions to air from a gas-fired combustion unit, with the exception of gas turbines
<table>
<tr><th>Parameter:</th><th>Type of combustion</th><th>BAT-AEL (monthly average) mg/Nm^3</th></tr>
<tr><td rowspan="2">NOx, expressed as NO_2</td><td rowspan="2">Gas firing</td><td>30 - 150 for existing unit (1)</td></tr>
<tr><td>30 - 100 for new unit</td></tr>
<tr><td colspan="3">(1) For an existing unit using high air pre-heat (i.e. > 200 C) or with H2 content in the fuel gas higher that 50% the upper end of the BAT-AEL range is 200 mg/Nm^3</td></tr>
</table>
Table 11 BAT –associated emission levels for NO_X emissions to air from a multi-fuel fired combustion unit with the exception of gas turbines
<table>
<tr><th>Parameter:</th><th>Type of combustion</th><th>BAT-AEL (monthly average) mg/Nm^3</th></tr>
<tr><td>NO_X expressed as NO_2</td><td>Multi-fuel fired combustion unit</td><td>30 -3—for existing unit (1) (2)</td></tr>
<tr><td colspan="3">(1) For existing units < 100 MW firing fuel oil with a nitrogen content higher that 0.5% (w/w) or with liquid firing > 50% or using air preheating values up to 450 mg/Nm^3 may occur
(2) The lower end of the range can be achieved by using the SCR technique</td></tr>
</table>
</td><td></td><td></td><td></td></tr>
</table>

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>The associated monitoring is in BAT 4</td><td></td><td></td><td></td></tr>
<tr><td>35</td><td>In order to prevent or reduce dust and metal emissions to air from the combustion units, BAT is to use one or a combination of the techniques given below.

I. Primary or process-related techniques, such as:

<table>
<tr><th>Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td colspan="3">Selection or treatment of fuel</td></tr>
<tr><td>(a) Use of gas to replace liquid fuel</td><td>Gas instead of liquid combustion leads to lower level of dust emissions
See section 1.20.3, Annex 1.</td><td>The applicability may be limited by the constraints associated with the availability of low sulphur fuels such as natural gas which may be impacted by the energy policy of the Member State</td></tr>
<tr><td>(b) Use of low sulphur refinery fuel oil (RFO) e.g. by RFO selection or by hydro-treatment of RFO</td><td>Refinery fuel oil selection favours low sulphur liquid fuels among the possible sources to be used at the unit. Hydrotreatment aims at reducing the sulphur, nitrogen and metal contents of the fuel
See section 1.20.3, Annex 1.</td><td>The applicability may be limited by the availability of low sulphur liquid fuels, hydrogen production and the hydrogen sulphide (H_2S) treatment capacity (e.g. amine and Claus units)</td></tr>
<tr><td colspan="3">Combustion modifications</td></tr>
<tr><td>(a) Optimisation of</td><td>See section 1.20.2, Annex 1.</td><td>Generally applicable to all types of</td></tr>
</table></td><td>NA</td><td>The Operator confirms that the requirements of BAT 35 are not applicable.

This BAT Conclusion only applies to units that burn RFG, which is not applicable to this facility, see BAT Conclusion 4 above.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)

combustion		combustion
(b) Atomisation of liquid fuel	Use of high pressure to reduce the droplet size of liquid fuel. Recent optimal burner designs generally include steam atomisation	Generally applicable to liquid fuel firing

II Secondary or end-of-pipe techniques, such as:

Technique	Description	Applicability
i. Electrostatic precipitator (ESP)	See section 1.20.1, Annex 1.	For existing units, the applicability may be limited by space availability
ii. Third stage blowback filter	See section 1.20.1, Annex 1.	Generally applicable
iii. Wet scrubbing	See section 1.20.1, Annex 1.	The applicability may be limited in arid areas and in the case where by-products from treatment (including e.g. waste water with a high level of salt) cannot be reused or appropriately disposed of. For existing units, the applicability of the technique may be limited by space availability
iv. Centrifugal washers	See section 1.20.1, Annex 1.	Generally applicable

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>Table 12 BAT – associated emission levels of dust emissions to air from a multi-fuel fired combustion unit with the exception of gas turbines

<table><tr><th>Parameter</th><th>Type of combustion</th><th>BAT-AEL (monthly average) mg/Nm^3</th></tr><tr><td rowspan="2">Dust</td><td rowspan="2">Multi-fuel firing</td><td>5 – 50 for existing unit (1) (2)</td></tr><tr><td>5 – 25 for new unit < 50 MW</td></tr><tr><td colspan="3">(1) The lower end of the range is achievable for units with the use of end-of-pipe techniques
(2) The upper end of the range refers to the use of a high percentage of oil burning and where only primary techniques are applicable</td></tr></table>
The associated monitoring is in BAT 4</td><td></td><td></td><td></td></tr>
<tr><td>36</td><td>In order to prevent or reduce SO_X emissions to air from the combustion units, BAT is to use one or a combination of the techniques given below.

I. Primary or process-related techniques

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Use of gas to replace liquid fuel</td><td>See section 1.20.3, Annex 1.</td><td>The applicability may be limited by the constraints associated with the availability of low sulphur fuels such as natural gas, which may be impacted by the energy policy of the Member State</td></tr><tr><td>ii. Treatment of</td><td>Residual H2S</td><td>For low calorific gas</td></tr></table></td><td>NA</td><td>The Operator confirms that the requirements of BAT 36 are not applicable.

This BAT Conclusion only applies to units that burn RFG, which is not applicable to this facility, see BAT Conclusion 4 above.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)

refinery fuel gas (RFG)	concentration in RFG depends on the treatment process parameter, e.g. the amine-scrubbing pressure. See Section 1.20.3, Annex 1.	containing carbonyl sulphide (COS) e.g. from coking units, a converter may be required prior to H_2S removal
iii. Use of low sulphur refinery fuel oil (RFO) e.g. by RFO selection or by hydrotreatment of RFO	Refinery fuel oil selection favours low sulphur liquid fuels among the possible sources to be used at the unit. Hydrotreatment aims at reducing the sulphur, nitrogen and metal contents of the fuel. See Section 1.20.3, Annex 1.	The applicability is limited by the availability of low sulphur liquid fuels, hydrogen production and the hydrogen sulphide (H_2S) treatment capacity (e.g. amine and Claus units

II. Secondary or end-of-pipe techniques

Technique	Description	Applicability
i. Non-regenerative scrubbing	Wet scrubbing or seawater scrubbing. See Section 1.20.3, Annex 1.	The applicability may be limited in arid areas and in the case where the by-products from treatment (including e.g. waste water with high level of salts) cannot be reused or appropriately disposed of. For existing units, the applicability of the

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)

		technique may be limited by space availability

Table 13 BAT – associated emission levels for SO_2 emissions to air from combustion unit firing refinery fuel gas (RFG), with the exception of gas turbines

Parameter	BAT-AEL (monthly average) mg/Nm^3
SO2	5 – 35 ([1])
(1) In the specific configuration of RFG treatment with a low scrubber operative pressure and with refinery fuel gas with an H/C molar ratio above 5, the upper end of the BAT-AEL range can be as high as 45 mg/Nm3	

The associated monitoring is in BAT 4

Table 14 BAT- associated emission levels for SO_2 emissions to air from multi-fuel fired combustion units, with the exception of gas turbines and stationary engines

Parameter	BAT-AEL (monthly average) mg/Nm^3
SO_2	35 - 600

The associated monitoring is in BAT 4

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
37	**In order to reduce carbon monoxide (CO) emissions to air from the combustion units, BAT is to use a combustion operation control.** Description: See section 1.20.5, Annex 1. **Table 15 BAT – associated emission levels for carbon monoxide emissions to air from combustion unit** **Parameter** | **BAT- AEL (monthly average) mg/Nm^3** Carbon monoxide expressed as CO | ≤ 100 Associated monitoring is in BAT 4.	NA	The Operator confirms that the requirements of BAT 37 are not applicable. This BAT Conclusion only applies to units that burn RFG, which is not applicable to this facility, see BAT Conclusion 4 above. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
38	**In order to reduce emissions to air from the etherification process, BAT is to ensure the appropriate treatment of process off-gases by routing them to the refinery fuel gas system.**	NA	The Operator responses do not indicate that etherification processes are carried out at the installation. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
39	**In order to prevent upset of the biotreatment, BAT is to use a storage tank and an appropriate unit production plan management to control the toxic components dissolved content (e.g. methanol, formic acid, ethers) of the waste water stream prior to final treatment.**	NA	The Operator responses do not indicate that this process is carried out at the installation. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
40	**In order to reduce emissions to air of chlorinated compounds, BAT is to optimise the use of chlorinated organic compounds used to maintain catalyst activity when such a process is in place or to use non-chlorinated catalytic systems.**	NA	The Operator responses do not indicate that this process is carried out at the installation. We consider that this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
41	**In order to reduce sulphur dioxide emissions to air from the natural gas plant, BAT is to apply BAT 54.**	NA	The Operator confirms that this is not relevant, as there is no sour gas. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
42	**In order to reduce nitrogen oxides (NO_X) emissions to air from the natural gas plant, BAT is to apply BAT 34**	NA	The Operator confirms that this applies only to units burning sales quality natural gas and therefore applies directly to the RB211 gas turbines. The LCPs are compliant with Chapter III of the IED. The only remaining operational unit is the small Thermox waste gas treatment unit (a 0.63 MW rated thermal input unit which burns RFG and which can be fired with sales quality natural gas). Regular monitoring of the Thermox unit is conducted internally to maintain combustion efficiency. Refer to BATs 4 and 34 above. We don't agree that this BAT Conclusion is not applicable to the relevant activities carried out at this installation. It applies to the LCP which has lower NOx limits than those required by BAT 34. We conclude that this BAT conclusion is CC.	2.3.1

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
43	**In order to prevent emissions of mercury when present in raw natural gas, BAT is to remove the mercury and recover the mercury-containing sludge for waste disposal.**	CC	The Operator confirms that mercury levels are inherently low in the gas phase for the incoming gas streams. Inlet gas has been analysed (data is available on request) and there is no requirement for removal from the gas phase. Mercury levels in the collected condensate are not routinely measured; however mercury monitoring is performed on breakage of containment for condensate storage tanks if a mercury contaminated sludge is suspected to be present. Any such sludges are contained within the vessel for specialist removal and off-site recovery of mercury. The Operator provided additional information 10 April 2018, including the extract from an analysis report, confirming that: The levels of mercury received and exported from the Terminal are extremely low, approximately 3 µg/m^3 received and 2 µg/m^3 exported. The workplace exposure limit for elemental mercury is 20 µg/m^3, as such, they do not consider there is a requirement to attempt to reduce further the already very low levels of mercury from the gas streams. They confirm that there is a small decrease in mercury in the outlet stream due to a very small 'drop out' of elemental mercury in the low temperature vessel, coalescing filters within the gas processing units. On occasion during planned maintenance, these filter elements are changed. The old filters are bagged, drummed and sent to a hazardous transfer station, where a suitable treatment route is determined. We agree with the Operator's stated compliance of CC.	2.3.1

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
44	**In order to prevent or reduce waste water flow generation from the distillation process, BAT is to use liquid ring vacuum pumps or surface condensers.** **Applicability**. May not be applicable in some retrofit cases. For new units, vacuum pumps, either in or not in combination with the steam ejectors, may be needed to achieve a high volume (10 mm Hg). Also, a spare should be available in case the vacuum pump fails.	NA	The Operator confirms that vacuum distillation is not undertaken. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
45	**In order to prevent or reduce water pollution from the distillation process, BAT is to route sour water to the stripping unit.**	NA	The Operator confirms that sour water is not generated. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
46	In order to prevent or reduce emissions to air from distillation units, BAT is to ensure the appropriate treatment of process off-gases, especially incondensable off-gases, by acid gas removal prior to further use. **Applicability**. Generally applicable for crude and vacuum distillation units. May not be applicable for standalone lubricant and bitumen refineries, with emissions of less than 1 t/d of sulphur compounds. In specific refinery configurations, applicability may be restricted, due to the need for e.g. large piping, compressors or additional amine treating capacity.	CC	The Operator confirms that the previous glycol regeneration system has been replaced with a methanol system. Emissions from the methanol distillation unit (MDU) are routed to the Thermox waste gas treatment unit. We agree with the Operator's stated compliance of CC.	2.3.1
47	**In order to reduce emissions to air from the products treatment process, BAT is to ensure the appropriate disposal of off-gases, especially odorous spent air from sweetening units, by routing them to destruction, e.g. by incineration.** **Applicability**. Generally applicable to products treatment processes where the gas streams can be safely processed to the destruction units. May not be applicable to sweetening units, due to safety reasons.	CC	The Operator confirms that there are no sweetening operations. Off-gases from condensate stabilisation process are recovered and returned to the gas dew-pointing inlet. The previous glycol regeneration system has been replaced with a methanol system. Emissions from the methanol distillation unit (MDU) are routed to the Thermox waste gas treatment unit. The Thermox unit also takes the methanol storage tank vapours. We agree with the Operator's stated compliance of CC.	2.3.1

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
48	**In order to reduce waste and waste water generation when a products treatment process using caustic is in place, BAT is to use cascading caustic solution and a global management of spent caustic, including recycling after appropriate treatment, e.g. by stripping.**	NA	The Operator confirms there is no caustic treatment at the facility. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
49	**In order to reduce VOC emissions to air from the storage of volatile liquid hydrocarbon compounds, BAT is to use floating roof storage tanks equipped with high efficiency seals or a fixed roof tank connected to a vapour recovery system.** **Description**. High efficiency seals are specific devices for limiting losses of vapour e.g. improved primary seals, additional multiple (secondary or tertiary) seals (according to quantity emitted). **Applicability**. The applicability of high efficiency seals may be restricted for retrofitting tertiary seals in existing tanks.	CC	The Operator confirms tank details as follows: <u>Two stabilised condensate tanks:</u> T01 and T02 (total capacity 2,650m^3) with floating roofs, vacuum vents and 'high efficiency seals' as described in BAT 49 i.e. secondary floating roof seals which effectively limit vapour losses as has been confirmed in the site wide DIAL survey described under BAT 6. Gases from the condensate stabilisation process are recovered by the gas reinjection compressors for reinjection to the fuel gas system. <u>One unstabilised condensate tank:</u> T03 (590m^3) with fixed bunded cylindrical cone roof linked to a vent drum. The tank is nitrogen blanketed to control pressure but not connected to a vapour recovery system. Fugitive VOC emissions are monitored for the site and are considered by the Operator to indicate that emissions are minimised from these tanks. Volatile liquid hydrocarbons are petroleum derivatives with a Reid vapour pressure (RVP) of more than 4 kPa, such as naphtha and aromatics. The Hydrocarbons Safety data sheet for crude condensate indicates a RVP of 5 to 15 psia, which equates to 35 to 103 kPa. We do not agree with the Operator's stated compliance of CC and have set an improvement condition to address this.	2.3.1

<table>
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<tr><td>50</td><td>In order to reduce VOC emissions to air from the storage of volatile liquid hydrocarbon compounds, BAT is to use one or a combination of the techniques given below.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Manual crude oil tank cleaning</td><td>Oil tank cleaning is performed by workers entering the tank and removing sludge manually</td><td>Generally applicable</td></tr><tr><td>ii. Use of a closed-loop system</td><td>For internal inspections, tanks are periodically emptied, cleaned and rendered gas-free. This cleaning includes dissolving the tank bottom. Closed-loop systems that can be combined with end-of-pipe mobile abatement techniques prevent or reduce VOC emissions</td><td>The applicability may be limited by e.g. the type of residues, tank roof construction or tank materials</td></tr></table></td><td>CC</td><td>The Operator confirms that one of the methods is used so this is sufficient to comply. Both manual and automatic cleaning systems are used for condensate tank cleaning however automatic systems are not closed loop and vapours are vented to atmosphere in preparation of the tanks for cleaning.

i Condensate tanks are cleaned out to prepare for integrity inspection to an agreed inspection frequency. Sludges can accumulate in the tanks and these are removed during the automatic cleaning process described below. In the event that a deposit has developed which requires manual cleaning, workers then enter the vessel wearing breathing apparatus to provide manual cleaning. The tank vapours are vented to air during the tank cleaning preparation stage.

ii An automatic cleaning system is used as described above. The system is not closed-loop and tank vapours are vented to air in the preparation for the cleaning process. The small number of tanks involved (three condensate tanks) makes investment in closed loop VOC abatement systems unlikely to be cost effective.

We agree with the Operator’s stated compliance of CC.</td><td>2.3.1</td></tr>
<tr><td>51</td><td>In order to prevent or reduce emissions to soil and groundwater from the storage of liquid hydrocarbon compounds, BAT is to use one or a combination of the techniques given below.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Maintenance programme including corrosion monitoring, prevention and control</td><td>A management system including leak detection and operational controls to prevent overfilling, inventory control and risk-based inspection</td><td>Generally applicable</td></tr></table></td><td>CC</td><td>The Operator confirms that a combination of techniques are applied to achieve compliance. EMS linked management systems are in place to minimise the risk of loss of containment including overfill of condensate tanks with risk based inspection at pre-determined intervals for integrity and maintenance to improve tank containment. Leak detection, spill and emergency response procedures are in place. Systems included - LOPA, MAXIMO preventative maintenance, SIL and LDAR.

i The EMS includes a method for evaluating</td><td>1.1
2.3.1
3.2.3</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement			Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
		procedures on tanks at intervals to prove their integrity, and maintenance to improve tank containment. It also includes a system response to spill consequences to act before spills can reach the groundwater. To be especially reinforced during maintenance periods			effectiveness of independent protection layers (control systems, alarms and safety instrumental systems, pressure valves, bunds etc.) in reducing frequency or consequence of hazardous events - procedure PUK-SMS-RM-002 - Layers of Protection Analysis. Condensate tanks T01 and T02 have been upgraded in accordance with COMAH guidance post-Buncefield and have automatic overfill control systems with High High level alarms linked to the trip pump to prevent overfill. Tanks are located in adequately sized bunds (110% of total tank storage capacity for single tank in bund or 25% of all tank storage capacities in shared bund). Condensate tank bunds have been upgraded to COMAH requirements with fire resistant seals, resealed floors, etc. The MAXIMO planned preventative maintenance system specifies requirements for condition (including corrosion) monitoring, with risk based inspection frequencies for bunds, tanks, pipelines and pressure vessels, tank alarms and level indicators and also covers safety critical items using SIL assessments. Leak minimisation is addressed through the Hydrocarbon Leak Reduction Policy including activities which are relevant to the installation and commissioning stage. The Hydrocarbon Release Reduction procedure includes a leak search procedure to locate potential and actual leaks. The Dimlington facility operates a LDAR programme as required by the EMS; leaks are recorded in the Maximo work order maintenance system and repair work is scheduled. Perenco operates a planned preventative maintenance (PPM) programme (Maximo) for ensuring	
	ii. Double bottomed tanks	A second impervious bottom that provides a measure of protection against releases from the first material	Generally applicable for new tanks and after an overhaul of existing tanks (1)			
	iii. Impervious membrane liners	A continuous leak barrier under the entire bottom surface of the tank	Generally applicable for new tanks and after an overhaul of existing tanks ([1])			
	iv. Sufficient tank farm bund containment	A tank farm bund is designed to contain large spills potentially caused by a shell rupture or overfilling (for both environmental and safety reasons). Size and associated building rules are generally defined by local regulations	Generally applicable			
	(1) Techniques ii and iii may be generally applicable where tanks are					

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td></td><td>dedicated to products that require heat for liquid handling (e.g. bitumen) and where no leak is likely because of solidification</td><td></td><td>the integrity of plant, equipment and environmentally critical systems.

Arrangements for response to emergency situations, including roles and responsibilities, procedures, contacts and emergency response exercise frequency, are described in procedures:
• Bacton Terminal Emergency Response Plan
• Bacton Terminal COMAH Offsite Plan
• Emergency Preparedness and Response Exercise and Testing Schedule

ii Tanks are existing and are not double bottomed and have not been recently overhauled.

iii Condensate tank (T01, T02, T03) bottoms are existing and have not been recently overhauled.

iv All condensate tanks are housed in bunds which are sized to contain 110% of the total tank storage capacity for single tanks or 25% of total tank storage capacities for multiple tanks in a bund.

We don’t agree that the Operator is fully compliant and have set an improvement condition to address those storage tanks and areas that fall outside the scope of the COMAH containment policy.</td><td></td></tr>
<tr><td>52</td><td>In order to prevent or reduce VOC emissions to air from loading and unloading operations of volatile liquid hydrocarbon compounds, BAT is to use one or a combination of the techniques given below to achieve a recovery rate of at least 95 %.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>Vapour recovery by:
i. Condensation
ii. Absorption
iii. Adsorption</td><td>See section 1.20.6, Annex 1.</td><td>Generally applicable to loading/unloading operations where annual throughput is</td></tr></table></td><td>NA</td><td>The Operator confirms that this is not applicable as all condensate is transferred off-site by pipeline. There is no loading/unloading of road or rail tankers hence BAT 52 is not directly applicable. The condensate product is not subject to directive EC/94/63 as it is not intended for use as a fuel for motor vehicles.

We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.</td><td>NA</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	iv. Membrane separation v. Hybrid systems | | > 5 000 m^3/yr. Not applicable to loading/unloading operations for sea-going vessels with an annual throughput < 1 million m^3/yr (1) (1) A vapour destruction unit (e.g. by incineration) may be substituted for a vapour recovery unit, if vapour recovery is unsafe or technically impossible because of the volume of return vapour **Table 16 BAT- associated emission levels for non-methane VOC and benzene emissions to air from loading and unloading operations of volatile liquid hydrocarbon compounds** **Parameter** | **BAT-AEL (hourly average) (1)** NMVOC | 0.15 - 10g/Nm^3 (2) (3) Benzene (3) | <1 mg/Nm^3 (1) Hourly values in continuous operation expressed and measured according to Directive 94/63/EA (2) Lower value achievable with two-stage hybrid systems. Upper value achievable with single-stage adsorption or membrane system (3) Benzene monitoring may not be necessary where emissions of NMVOC are at the lower end of the range.			
53	**In order to reduce emissions to water from visbreaking and other thermal processes, BAT is to ensure the appropriate treatment of waste water streams by applying the techniques of BAT 11.**	NA	The Operator responses do not indicate that visbreaking or other thermal processes are carried out at the installation. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA
54	**In order to reduce sulphur emissions to air from off-gases containing hydrogen sulphides (H_2S), BAT is to use all of the techniques given below.** **Technique** | **Description** | **Applicability**	NA	The Operator confirms that there is no sour gas. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)

i. Acid gas removal e.g. by amine treating	See section 1.20.3, Annex 1.	Generally applicable
ii. Sulphur recovery unit (SRU), e.g. by Claus process	See section 1.20.3, Annex 1.	Generally applicable
iii. Tail gas treatment unit (TGTU)	See section 1.20.3, Annex 1.	For retrofitting existing SRU, the applicability may be limited by the SRU size and configuration of the units and the type of sulphur recovery process already in place
(1) My not be applicable for stand-alone lubricant or bitumen refineries with a release of sulphur compounds of less than 1 t/d		

Table 17 BAT-associated environmental performance levels for a waste gas sulphur (H_2S) recovery system

	BAT-associated environmental performance level (monthly average)
Acid gas removal	Achieve hydrogen sulphides (H2S) removal in the treated RFG in order to meet gas firing BAT-AEL for BAT 36
Sulphur recovery efficiency ([1])	New unit: 99.5 – > 99.9 % Existing unit: ≥ 98.5 %
(1) Sulphur recovery efficiency is calculated over the whole treatment chain (including SRU and TGTU) as the fraction of sulphur in the feed that is recovered in the sulphur stream routed to the collection pots. When the applied technique does not include a recovery of sulphur (e.g. seawater scrubber) it refers to the sulphur removal efficiency, as the % of sulphur removed by the whole treatment chain	

The associated monitoring is described in BAT 4.

<table>
<tr><th>BAT Conclusion Number</th><th>Summary of BAT Conclusion requirement</th><th>Status NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement</th><th>Relevant permit condition(s)</th></tr>
<tr><td>55</td><td>In order to prevent emissions to air from flares, BAT is to use flaring only for safety reasons or for non-routine operational conditions (e.g. start-ups, shutdown).</td><td>CC</td><td>The Operator confirms that flaring occurs approximately once every three years for full terminal shut-down and maintenance. 70-80 tonnes of methane is flared per event. The flare is smokeless. The site's operating philosophy is to carry out maintenance without the need to release gas wherever possible.

The flare is used to depressurise the whole site for major maintenance.

Cold venting takes place at the facility. Details of this were provided by the Operator 09 April 2018 and are described in Section 7 below.

We agree with the Operator’s stated compliance of CC.</td><td>2.3.1</td></tr>
<tr><td>56</td><td>In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use the techniques given below.

<table><tr><th>Technique</th><th>Description</th><th>Applicability</th></tr><tr><td>i. Correct plant design</td><td>See section 1.20.7, Annex 1.</td><td>Applicable to new units.
Flare gas recovery system may be retrofitted in existing units</td></tr><tr><td>ii. Plant management</td><td>See section 1.20.7, Annex 1.</td><td>Generally applicable</td></tr><tr><td>iii. Correct flaring devices design</td><td>See section 1.20.7, Annex 1.</td><td>Applicable to new units</td></tr><tr><td>iv. Monitoring and reporting</td><td>See section 1.20.7, Annex 1.</td><td>Generally applicable</td></tr></table></td><td>CC</td><td>The Operator confirms the following:

The flare has been included in the EU ETS permit and there will be accurate fuel gas monitoring data collated as well as current system of recording flare events and times, estimations of gas sent to flaring and associated parameters of combustion e.g. flow gas mixture and heat content, ratio of assistance, velocity, purge gas flow rate, calculated pollutant emissions. Flaring ratio calculation will be more accurate.

i There is a segregated system to minimise the amount of gas vented for maintenance purposes. Gas is flared only during specific full site shut-down approximately once every three years i.e. other than normal operations. 70-80 tonnes of methane flared per event.

Flare is smokeless. The site's operating philosophy is to carry out maintenance without the need to release gas wherever possible. Retro-fitting of flare gas recovery is not deemed feasible given the extensive changes to plant pipe-work required to capture the limited volume</td><td>2.3.1</td></tr>
</table>

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
			of gas flared. ii Flaring occurs approximately once every three years during full site shut-down for maintenance purposes only. The site's operating philosophy is to carry out maintenance without the need to release gas wherever possible. VOC and methane emissions to air are minimised through a combination of managed processes including the gas reinjection compressors which recover gases evolved from combustion stabilisation, the Thermox unit which oxidises VOC emissions from the glycol regeneration units (and will treat off-gases from the replacement methanol distillation unit and associated methanol storage tank). Stabilised condensate tanks are floating roof tanks with double seals and high integrity valves minimise emissions during tank filling. iii NA to existing units. iv The BREF states: Flare monitoring is needed in order to keep records of each event as part of the monitoring system of the refinery and to report to the local authority. Flares should be visually monitored under non-emergency conditions. See section 4.23.7 Flares in BREF for Refining of Mineral Oil and Gas, 2015. The Operator confirmed in their response sent 29 March 2018 that there is no measurable sulphur in the gas, hence no SO_2 is released. On this basis, we have not included the notification condition for SO_2 released. As the flare is used infrequently for maintenance we have not required an improvement condition to study flare usage.	

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
			We have added an improvement condition for a gas management improvement plan. We have not added any additional reporting conditions as the necessary information is collected via Table S4.3 of the permit, Performance parameters. We agree with the Operator's stated compliance of CC.	
57	**In order to achieve an overall reduction of NO_X emissions to air from combustion units and fluid catalytic cracking (FCC) units, BAT is to use an integrated emission management technique as an alternative to applying BAT 24 and BAT 34.** **Description:** The technique consists of managing NO_X emissions from several or all combustion units and FCC units on a refinery site in an integrated manner, by implementing and operating the most appropriate combination of BAT across the different units concerned and monitoring the effectiveness thereof, in such a way that the resulting total emissions are equal to or lower than the emissions that would be achieved through a unit-by-unit application of the BAT-AELs referred to in BAT 24 and BAT 34. This technique is especially suitable to oil refining sites: • with a recognised site complexity, multiplicity of combustion and process units interlinked in terms of their feedstock and energy supply; • with frequent process adjustments required in function of the quality of the crude received; • with a technical necessity to use a part of process residues as internal fuels, causing frequent adjustments of the fuel mix according to process requirements. **BAT-associated emission levels: See Table 18.** In addition, for each new combustion unit or new FCC unit included in the integrated emission management system, the BAT-AELs set out	NA	The Operator confirms that this is not applicable. The Operator has not requested to use an integrated emission management technique for the control or NO_X. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	under BAT 24 and BAT 34 remain applicable. **Table 18 BAT associated emission levels for NOX emissions to air when applying BAT 58** The BAT-AEL for NO_x emissions from the units concerned by BAT 57, expressed in mg/Nm_3 as a monthly average value, is equal to or less than the weighted average of the NO_x concentrations (expressed in mg/Nm_3 as a monthly average) that would be achieved by applying in practice at each of those units techniques that would enable the units concerned to meet the following: (a) for catalytic cracking process (regenerator) units: the BAT-AEL range set out in Table 4 (BAT 24); (b) for combustion units burning refinery fuels alone or simultaneously with other fuels: the BAT-AEL ranges set out in Tables 9, 10 and 11 (BAT 34). This BAT-AEL is expressed by the following formula: Σ [(flue gas flow rate of the unit concerned) x (NO_x concentration that would be achieved for that unit)] --- Σ(flue gas flow rate of all units concerned) Notes 1. The applicable reference conditions for oxygen are those specified in Table 1. 2. The weighing of the emission levels of the individual units is done on the basis of the flue-gas flow rate of the unit concerned, expressed as a monthly average value (Nm^3/hour), which is representative for the normal operation of that unit within the refinery installation (applying the reference conditions under Note 1). 3. In case of substantial and structural fuel changes which are affecting the applicable BAT-AEL for a unit or other substantial			

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	and structural changes in the nature or functioning of the units concerned, or in case of their replacement or extension or the addition of combustion units or FCC units, the BAT-AEL defined in Table 18 needs to be adjusted accordingly. Monitoring associated with BAT 57 BAT for monitoring emissions of NO_x under an integrated emission management technique is as in BAT 4, complemented with the following: • a monitoring plan including a description of the processes monitored, a list of the emission sources and source streams (products, waste gases) monitored for each process and a description of the methodology (calculations, measurements) used and the underlying assumptions and associated level of confidence; • continuous monitoring of the flue-gas flow rates of the units concerned, either through direct measurement or by an equivalent method; • a data management system for collecting, processing and reporting all monitoring data needed to determine the emissions from the sources covered by the integrated emission management technique.			
58	**In order to achieve an overall reduction of SO_2 emissions to air from combustion units, fluid catalytic cracking (FCC) units and waste gas sulphur recovery units, BAT is to use an integrated emission management technique as an alternative to applying BAT 26, BAT 36 and BAT 54.** **Description:** The technique consists of managing SO_2 emissions from several or all combustion units, FCC units and waste gas sulphur recovery units on a refinery site in an integrated manner, by implementing and operating the most appropriate combination of BAT across the different units concerned and monitoring the effectiveness thereof, in such a way that the resulting total emissions are equal to	NA	The Operator confirms that this is not applicable. The Operator has not requested to use an integrated emission management technique for the control or SO_2. We agree this BAT Conclusion is not applicable to the relevant activities carried out at this installation.	NA

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	or lower than the emissions that would be achieved through a unit-by-unit application of the BAT-AELs referred to in BAT 26 and BAT 36 as well as the BAT-AEPL set out under BAT 54. This technique is especially suitable to oil refining sites: • with a recognised site complexity, multiplicity of combustion and process units interlinked in terms of their feedstock and energy supply; • with frequent process adjustments required in function of the quality of the crude received; • with a technical necessity to use a part of process residues as internal fuels, causing frequent adjustments of the fuel mix according to process requirements. **BAT associated emission level**: See Table 19. In addition, for each new combustion unit, new FCC unit or new waste gas sulphur recovery unit included in the integrated emission management system, the BAT-AELs set out under BAT 26 and BAT 36 and the BAT- AEPL set out under BAT 54 remain applicable. **Table 19 BAT associated emission level for SO_2 when applying BAT 58** The BAT-AEL for SO_2 emissions from the units concerned by BAT 58, expressed in mg/Nm_3 as a monthly average value, is equal to or less than the weighted average of the SO_2 concentrations (expressed in mg/Nm_3 as a monthly average) that would be achieved by applying in practice at each of those units techniques that would enable the units concerned to meet the following: (a) for catalytic cracking process (regenerator) units: the BAT-AEL ranges set out in Table 6 (BAT 26); (b) for combustion units burning refinery fuels alone or			

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	simultaneously with other fuels: the BAT-AEL ranges set out in Table 13 and in Table 14 (BAT 36); and (c) for waste gas sulphur recovery units: the BAT-AEPL ranges set out in Table 17 (BAT 54). This BAT-AEL is expressed by the following formula: $\frac{\Sigma\,[(\text{flue gas flow rate of the unit concerned}) \times (SO_2 \text{ concentration that would be achieved for that unit})]}{\Sigma(\text{flue gas flow rate of all units concerned})}$ Notes: 1. The applicable reference conditions for oxygen are those specified in Table 1. 2. The weighing of the emission levels of the individual units is done on the basis of the flue-gas flow rate of the unit concerned, expressed as the monthly average value (Nm^3/hour), which is representative for the normal operation of that unit within the refinery installation (applying the reference conditions under Note 1). 3. In case of substantial and structural fuel changes which are affecting the applicable BAT-AEL for a unit or other substantial and structural changes in the nature or functioning of the units concerned, or in case of their replacement, extension or the addition of combustion, FCC, or waste gas sulphur recovery units, the BAT-AEL defined in Table 19 needs to be adjusted accordingly. **Monitoring associated with BAT 58** **BAT for monitoring emissions of SO_2 under an integrated emission management approach is as in BAT 4, complemented with the following:** • **a monitoring plan including a description of the**			

BAT Conclusion Number	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement	Relevant permit condition(s)
	processes monitored, a list of the emission sources and source streams (products, waste gases) monitored for each process and a description of the methodology (calculations, measurements) used and the underlying assumptions and associated level of confidence; • **continuous monitoring of the flue-gas flow rates of the units concerned, either through direct measurement or by an equivalent method;** • **a data management system for collecting, processing and reporting all monitoring data needed to determine the emissions from the sources covered by the integrated emission management technique**			

6 Emissions to Water

The consolidated permit incorporates three discharges W1 to W3.

W1 and W2 are uncontaminated surface run-off via a firewater pond. There is no requirement for monitoring or limits at these locations.

W3 is a low pressure line which transports process effluent to the Easington Site where a high pressure line transports the effluent offshore. Historically the water was separated from the process and sent to treatment sites for processing and ultimate discharge to controlled waters. This resulted in some 600+ tanker movements per year in excess of 50 miles each way.

The Operator is required to report to the offshore regulator (the Department for Business, Energy & Industrial Strategy BEIS, formerly DECC) the mass of water and the mass of oil re-injected into the reservoir.

The BAT AELs and the requirements of the WFD are not applicable to these releases.

7 Additional IED Chapter II requirements:

Other Part A installation permits relating to this installation	Added underneath the permit status log. Required to include the Amethyst pipeline connection which is a directly associated activity to the adjacent Easington Gas Terminal (EPR/AP3833LW).
Condition 3.1.3 Where a substance is specified in schedule 3 tables S3.2 but no limit is set for it, the concentration of such substance in emissions to water from the relevant emission point shall be no greater than the background concentration	This condition is deleted. It is not required as it is only intended to cover substances for which there is concern but there is not an established EQS or predicted no-effect concentration. Its use requires advice from specialist staff. Condition 3.1.4 for periodic monitoring becomes 3.1.3.
Table S1.1, Activities	Amended to include combustion plant at <50 MWth as a directly associated activity.
	Limits of specified activity amended for pumping of process waters offshore for re-injection into gas reservoirs.
	Deleted the directly associated activity for the storage and stabilisation of raw condensate and replaced with the listed activity below, on the basis that condensate is considered a crude oil. Section 1.2 Part A(1)(e)(i) for the loading, unloading, handling or storage of, or the physical, chemical or thermal treatment of crude oil.
	Deleted the directly associated activity for the five heaters at < 3 MWth each. The Operator confirmed in their response sent 29 March 2018, that the units are decommissioned and will not be returned into service.
Table S1.2, Operating techniques	Addition of 'Attachment titled 'ET Plot plan Deconstruct' containing a copy of plan 580-104609 revision 2' at the request of the compliance officer.

Table S1.3, Improvement programme requirements	Addition of improvement conditions at the request of the compliance officer to secure decommissioning works for redundant plant at the Easington terminal. Refer to CAR form Report ID: PP3237CR/0304798
Table S3.1, Point source emission to air	Updated to remove emission points A9 to A15 which are redundant.
	Added agreed monitoring method BS CEN/TS 13649 for emission point A16.
	Updated to remove emission point A24 for the MDU vent, which was added in error. A17 & A18 were previously the glycol vents; however the glycol system has been removed. The MDU system actually vents via these emission points when the Thermox unit is unavailable and not via A24.
	Updated A19 description which is operational and emergency cold venting.
	A21 is only a flare, no maintenance venting at this location.
Table S3.2, Point source emissions to water	Added a footnote to the table to confirm that the Operator is required to report to the offshore regulator (the Department for Business, Energy & Industrial Strategy BEIS, formerly DECC) the mass of water and the mass of oil re-injected into the reservoir.
Table S3.3	Added to include annual limits which had been removed in error by an earlier variation. Toluene and xylene were removed as no monitoring is required for these parameters on the Thermox unit (emission point A16). Previous calculation and monitoring showed them to be below the limit of detection. The benzene limit is retained as this parameter is monitored at A16 and has an

	emission limit value.
Table S4.1, Reporting of monitoring data	Amended to remove dust monitoring which isn't a requirement of the permit.
Table S4.2, Resource efficiency metrics	Amended to remove metrics which are not applicable.
Table S4.3, Chapter III Performance parameters, and other performance parameters	Amended to include reporting for cold venting/MDU venting and to distinguish between DEFRA (Chapter III) and other reporting. Some additional interpretations were also added to Schedule 6 of the permit, see below. The Operator provided the following information for the operation of the cold vent at emission point A19: The purpose of the vent is to direct any flammable hydrocarbons to a safe location. This is a continuous process, as a safety system, it is permanently available and operated continuously. The mass of gas vented is based upon operational processes, so cannot be exactly determined. Measurement is also influenced by high winds, which exacerbate the recorded venting figures (venturi effect across the vent tip). The average annual release via the process vent is approximated at 300 tonnes. Non-routine/outside of scope operation would be a site emergency depressurisation event, when the discharge rate could be 10's of tonnes of gas per hour.

Schedule 6, Interpretation	Added the definition for “annually”.
	“EP Regulations” definition updated with 2016 No.1154.
	Added the definition for “BAT” and “The BREF”.
	Amended to remove “background concentration” definition, which is only required when the standard condition for the background concentration is included in the permit (see condition 3.1.3 above) (Emissions to water, air or land).
	Amended to remove the background concentration from “emissions of substances not controlled by emission limits” definition.
	Added definitions for “Normal operation” and “Other than normal operating conditions” for cold venting and flaring.

8 Review and assessment of changes that are not part of the BAT Conclusions derived permit review.

This document should be read in conjunction with the response to the Regulation 60 Notice, supporting information and permit/notice.

Aspect considered	Justification / Detail
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the Regulation 60 response that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.
Scope of consultation	The consultation requirements were reviewed and did not need to be implemented. The decision was taken in accordance with the Environmental Permitting Regulations and our public participation statement.
Control of the facility	We are satisfied that the Operator is the person who will have control over the operation of the facility after the issue of the consolidation. The decision was taken in accordance with our guidance on legal Operator for environmental permits.
Applicable directives	All applicable European directives have been considered in the determination of the Regulation 60 response.
Site condition report	The Operator has provided a description of the condition of the site, Environmental site investigation, report ref: 934618-RPT-1-rev1, dated January 2017. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED– guidance and templates (H5).
Biodiversity, Heritage, Landscape and Nature Conservation	The installation is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. A full assessment of the application and its potential to affect the sites/species/habitats has not been carried out as part of the permitting process. We consider that the application will not affect the features of the sites/species/habitats.
Operating techniques	We have reviewed the techniques used by the Operator and compared these with the relevant guidance notes. The proposed techniques/emission levels for priorities for

Aspect considered	Justification / Detail
	control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with the Refining of Mineral Oil and Gas BREF and BAT Conclusions, and ELVs deliver compliance with BAT AELs.
Updating permit conditions during consolidation.	We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit. The Operator has agreed that the new conditions are acceptable.
Use of conditions other than those from the template	Based on the information in the Regulation 60 response, we do not consider that we need to impose conditions other than those in our permit template, which was developed in consultation with industry having regard to the relevant legislation.
Raw materials	We have not specified limits and controls on the use of raw materials and fuels.
Pre-operational conditions	Based on the information in the Regulation 60 response, we consider that we do not need to impose pre-operational conditions.
Improvement conditions	Based on the information on the Regulation 60 response, we consider that we need to impose improvement conditions. The justifications are provided in the relevant sections of this document.
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the Regulation 60 response, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques table in the permit.
Emission limits	We have decided that emission limits should be set for the parameters listed in the permit. The justifications are provided in the relevant sections of this document.
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. Based on the information in the Regulation 60 response we are satisfied that the Operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Aspect considered	Justification / Detail
Reporting	We have specified reporting in the permit. The reporting frequencies reflect that of the permit before it was varied.
Management system	There is no known reason to consider that the Operator will not have the management system to enable it to comply with the permit conditions. The decision was taken in accordance with the guidance on Operator competence and how to develop a management system for environmental permits.
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit. Paragraph 1.3 of the guidance says: "The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation." We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections. We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate Operators because the standards applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Annex 1: BAT conclusions for the Refining of Mineral Oil and Gas - Glossary.

1.20 Description of techniques for the prevention and control of emissions to air.

1.20.1 Dust

Technique	Description
Electrostatic precipitator (ESP)	Electrostatic precipitators operate such that particles are charged and separated under the influence of an electrical field. Electrostatic precipitators are capable of operating under a wide range of conditions. Abatement efficiency may depend on the number of fields, residence time (size), catalyst properties and upstream particles removal devices. At FCC units, 3-field ESPs and 4-field ESPs are commonly used. ESPs may be used on a dry mode or with ammonia injection to improve the particle collection. For the calcining of green coke, the ESP capture efficiency may be reduced due to the difficulty for coke particles to be electrically charged
Multistage cyclone separators	Cyclonic collection device or system installed following the two stages of cyclones. Generally known as a third stage separator, common configuration consists of a single vessel containing many conventional cyclones or improved swirl-tube technology. For FCC, performance mainly depends on the particle concentration and size distribution of the catalyst fines downstream of the regenerator internal cyclones
Centrifugal washers	Centrifugal washers combine the cyclone principle and an intensive contact with water e.g. venturi washer
Third stage blowback filter	Reverse flow (blowback) ceramic or sintered metal filters where, after retention at the surface as a cake, the solids are dislodged by initiating a reverse flow. The dislodged solids are then purged from the filter system

1.20.2. Nitrogen oxides (NO_X)

Technique	Description
Combustion modifications	
Staged combustion	- Air staging — involves substoichiometric firing in a first step and the subsequent addition of the remaining air or oxygen into the furnace to complete combustion - Fuel staging — a low impulse primary flame is developed in the port neck; a secondary flame covers the root of the primary flame reducing its core temperature

Flue-gas recirculation	Reinjection of waste gas from the furnace into the flame to reduce the oxygen content and therefore the temperature of the flame. Special burners using the internal recirculation of combustion gases to cool the root of the flames and reduce the oxygen content in the hottest part of the flames
Use of low-NO_X burners (LNB)	The technique (including ultra-low-NO_X burners) is based on the principles of reducing peak flame temperatures, delaying but completing the combustion and increasing the heat transfer (increased emissivity of the flame). It may be associated with a modified design of the furnace combustion chamber. The design of ultra-low-NOX burners (ULNB) includes combustion staging (air/fuel) and flue-gas recirculation. Dry low-NO_X burners (DLNB) are used for gas turbines
Optimisation of combustion	Based on permanent monitoring of appropriate combustion parameters (e.g. O_2, CO content, fuel to air (or oxygen) ratio, unburnt components), the technique uses control technology for achieving the best combustion conditions
Diluent injection	Inert diluents, e.g. flue-gas, steam, water, nitrogen added to combustion equipment reduce the flame temperature and consequently the concentration of NO_X in the flue-gases
Selective catalytic reduction (SCR)	The technique is based on the reduction of NO_X to nitrogen in a catalytic bed by reaction with ammonia (in general aqueous solution) at an optimum operating temperature of around 300-450 °C. One or two layers of catalyst may be applied. A higher NO_X reduction is achieved with the use of higher amounts of catalyst (two layers)
Selective non-catalytic reduction (SNCR)	The technique is based on the reduction of NOX to nitrogen by reaction with ammonia or urea at a high temperature. The operating temperature window must be maintained between 900 °C and 1 050 °C for optimal reaction
Low temperature NO_X oxidation	The low temperature oxidation process injects ozone into a flue-gas stream at optimal temperatures below 150 °C, to oxidise insoluble NO and NO_2 to highly soluble N_2O_5. The N_2O_5 is removed in a wet scrubber by forming dilute nitric acid waste water that can be used in plant processes or neutralised for release and may need additional nitrogen removal

1.20.3. Sulphur oxides (SO_X)

Technique	Description
Treatment of refinery fuel gas (RFG)	Some refinery fuel gases may be sulphur-free at source (e.g. from catalytic reforming and isomerisation processes) but most other processes produce sulphur-containing gases (e.g. off-gases from the visbreaker, hydrotreater or catalytic cracking units). These gas streams require an appropriate treatment for gas desulphurisation (e.g. by acid gas removal — see below — to remove H_2S) before being released to the refinery fuel gas system

Refinery fuel oil (RFO)	desulphurisation by hydrotreatment In addition to selection of low-sulphur crude, fuel desulphurisation is achieved by the hydrotreatment process (see below) where hydrogenation reactions take place and lead to a reduction in sulphur content
Use of gas to replace liquid fuel	Decrease the use of liquid refinery fuel (generally heavy fuel oil containing sulphur, nitrogen, metals, etc.) by replacing it with on-site Liquefied Petroleum Gas (LPG) or refinery fuel gas (RFG) or by externally supplied gaseous fuel (e.g. natural gas) with a low level of sulphur and other undesirable substances. At the individual combustion unit level, under multi-fuel firing, a minimum level of liquid firing is necessary to ensure flame stability
Use of SO_X reducing catalysts additives	Use of a substance (e.g. metallic oxides catalyst) that transfers the sulphur associated with coke from the regenerator back to the reactor. It operates most efficiently in full combustion mode rather than in deep partial-combustion mode. NB: SO_X reducing catalysts additives might have a detrimental effect on dust emissions by increasing catalyst losses due to attrition, and on NO_X emissions by participating in CO promotion, together with the oxidation of SO_2 to SO_3
Hydrotreatment	Based on hydrogenation reactions, hydrotreatment aims mainly at producing low-sulphur fuels (e.g. 10 ppm gasoline and diesel) and optimising the process configuration (heavy residue conversion and middle distillate production). It reduces the sulphur, nitrogen and metal content of the feed. As hydrogen is required, sufficient production capacity is needed. As the technique transfer sulphur from the feed to hydrogen sulphide (H_2S) in the process gas, treatment capacity (e.g. amine and Claus units) is also a possible bottleneck
Acid gas removal e.g. by amine treating	Separation of acid gas (mainly hydrogen sulphide) from the fuel gases by dissolving it in a chemical solvent (absorption). The commonly used solvents are amines. This is generally the first step treatment needed before elemental sulphur can be recovered in the SRU
Sulphur recovery unit (SRU)	Specific unit that generally consists of a Claus process for sulphur removal of hydrogen sulphide (H_2S)-rich gas streams from amine treating units and sour water strippers. SRU is generally followed by a tail gas treatment unit (TGTU) for remaining H_2S removal

Tail gas treatment unit (TGTU)	A family of techniques, additional to the SRU in order to enhance the removal of sulphur compounds. They can be divided into four categories according to the principles applied: - direct oxidation to sulphur - continuation of the Claus reaction (sub-dewpoint conditions) - oxidation to SO_2 and recovering sulphur from SO_2 - reduction to H_2S and recovery of sulphur from this H_2S (e.g. amine process)
Wet scrubbing	In the wet scrubbing process, gaseous compounds are dissolved in a suitable liquid (water or alkaline solution). Simultaneous removal of solid and gaseous compounds may be achieved. Downstream of the wet scrubber, the flue-gases are saturated with water and a separation of the droplets is required before discharging the flue-gases. The resulting liquid has to be treated by a waste water process and the insoluble matter is collected by sedimentation or filtration According to the type of scrubbing solution, it can be: - a non-regenerative technique (e.g. sodium or magnesium-based) - a regenerative technique (e.g. amine or soda solution) According to the contact method, the various techniques may require e.g.: - Venturi using the energy from inlet gas by spraying it with the liquid - packed towers, plate towers, spray chambers. Where scrubbers are mainly intended for SO_X removal, a suitable design is needed to also efficiently remove dust. The typical indicative SO_X removal efficiency is in the range 85-98 %.
Non-regenerative scrubbing	Sodium or magnesium-based solution is used as alkaline reagent to absorb SO_X generally as sulphates. Techniques are based on e.g.: — wet limestone — aqueous ammonia — seawater (see infra)
Seawater scrubbing	A specific type of non-regenerative scrubbing using the alkalinity of the seawater as solvent. Generally requires an upstream abatement of dust
Regenerative scrubbing	Use of specific SO_X absorbing reagent (e.g. absorbing solution) that generally enables the recovery of sulphur as a by-product during a regenerating cycle where the reagent is reused

1.20.4. Combined techniques (SOx, NOx and dust)

Technique	Description
Wet scrubbing	See Section 1.20.3
SNO_X combined technique	Combined technique to remove SOX, NOX and dust where a first dust removal stage (ESP) takes place followed by some specific catalytic processes. The sulphur compounds are recovered as commercial-grade concentrated sulphuric acid, while NO_X is reduced to N_2. Overall SO_X removal is in the range: 94-96,6 %. Overall NO_X removal is in the range: 87-90 %

1.20.5. Carbon monoxide (CO) Technique

Technique	Description
Combustion operation control	The increase in CO emissions due to the application of combustion modifications (primary techniques) for the reduction of NO_X emissions can be limited by a careful control of the operational parameters
Catalysts with carbon monoxide (CO) oxidation promoters	Use of a substance which selectively promotes the oxidation of CO into CO_2 (combustion
Carbon monoxide (CO) boiler	Specific post-combustion device where CO present in the flue-gas is consumed downstream of the catalyst regenerator to recover the energy It is usually used only with partial-combustion FCC units

1.20.6. Volatile organic compounds (VOC)

Technique	Description
Vapour recovery	Volatile organic compounds emissions from loading and unloading operations of most volatile products, especially crude oil and lighter products, can be abated by various techniques e.g.: - Absorption: the vapour molecules dissolve in a suitable absorption liquid (e.g. glycols or mineral oil fractions such as kerosene or reformate). The loaded scrubbing solution is desorbed by reheating in a further step. The desorbed gases must either be condensed, further processed, and incinerated or re-absorbed in an appropriate stream (e.g. of the product being recovered) - Adsorption: the vapour molecules are retained by activate sites on the surface of adsorbent solid materials, e.g. activated carbon (AC) or zeolite. The adsorbent is periodically regenerated. The resulting desorbate is then absorbed in a circulating stream of the product being recovered in a downstream wash column. Residual gas from wash column is sent to further treatment - Membrane **gas separation**: the vapour molecules are

	processed through selective membranes to separate the vapour/air mixture into a hydrocarbon- enriched phase (permeate), which is subsequently condensed or absorbed, and a hydrocarbon-depleted phase (retentate). - Two-**stage refrigeration/condensation**: by cooling of the vapour/gas mixture the vapour molecules condense and are separated as a liquid. As the humidity leads to the icing-up of the heat exchanger, a two-stage condensation process providing for alternate operation is required. - Hybrid **systems**: combinations of available techniques *NB* Absorption and adsorption processes cannot notably reduce methane emissions
Vapour destruction	Destruction of VOCs can be achieved through e.g. **thermal oxidation** (incineration) or **catalytic oxidation** when recovery is not easily feasible. Safety requirements (e.g. flame arrestors) are needed to prevent explosion. **Thermal oxidation** occurs typically in single chamber, refractory-lined oxidisers equipped with gas burner and a stack. If gasoline is present, heat exchanger efficiency is limited and preheat temperatures are maintained below 180 °C to reduce ignition risk. Operating temperatures range from 760 °C to 870 °C and residence times are typically 1 second. When a specific incinerator is not available for this purpose, an existing furnace may be used to provide the required temperature and residence times. **Catalytic oxidation** requires a catalyst to accelerate the rate of oxidation by adsorbing the oxygen and the VOCs on its surface The catalyst enables the oxidation reaction to occur at lower temperature than required by thermal oxidation: typically ranging from 320 °C to 540 °C. A first preheating step (electrically or with gas) takes place to reach a temperature necessary to initiate the VOCs catalytic oxidation. An oxidation step occurs when the air is passed through a bed of solid catalysts
LDAR (leak detection and repair) programme	An LDAR (leak detection and repair) programme is a structured approach to reduce fugitive VOC emissions by detection and subsequent repair or replacement of leaking components. Currently, sniffing (described by EN 15446) and optical gas imaging methods are available for the identification of the leaks. **Sniffing method**: The first step is the detection using hand-held VOC analysers measuring the concentration adjacent to the equipment (e.g. by using flame ionisation or photo-ionisation). The second step consists of bagging the component to carry out a direct measurement at the source of emission. This second step is sometimes replaced by mathematical correlation curves derived from statistical results obtained from a large number of previous measurements made on similar components.

	Optical gas imaging methods: Optical imaging uses small lightweight hand- held cameras which enable the visualisation of gas leaks in real time, so that they appear as 'smoke' on a video recorder together with the normal image of the component concerned to easily and rapidly locate significant VOC leaks. Active systems produce an image with a back-scattered infrared laser light reflected on the component and its surroundings. Passive systems are based on the natural infrared radiation of the equipment and its surroundings
VOC diffuse emissions monitoring	Full screening and quantification of site emissions can be undertaken with an appropriate combination of complementary methods, e.g. Solar occultation flux (SOF) or differential absorption lidar (DIAL) campaigns. These results can be used for trend evaluation in time, cross checking and updating/validation of the ongoing LDAR programme. **Solar occultation flux (SOF)**: The technique is based on the recording and spectrometric Fourier Transform analysis of a broadband infrared or ultraviolet/ visible sunlight spectrum along a given geographical itinerary, crossing the wind direction and cutting through VOC plumes. **Differential absorption LIDAR (DIAL)**: DIAL is a laser-based technique using differential adsorption LIDAR (light detection and ranging) which is the optical analogue of sonic radio wave-based RADAR. The technique relies on the back-scattering of laser beam pulses by atmospheric aerosols, and the analysis of spectral properties of the returned light collected with a telescope
High-integrity equipment	High-integrity equipment includes e.g.: - valves with double packing seals - magnetically driven pumps/compressors/agitators - pumps/compressors/agitators fitted with mechanical seals instead of packing - high-integrity gaskets (such as spiral wound, ring joints) for critical applications

1.20.7. Other techniques

Techniques to prevent or reduce emissions from flaring	**Correct plant design**: includes sufficient flare gas recovery system capacity, the use of high-integrity relief valves and other measures to use flaring only as a safety system for other than normal operations (start-up, shutdown, emergency). **Plant management**: includes organisational and control measures to reduce flaring events by balancing RFG system, using advanced process control, etc. **Flaring devices design**: includes height, pressure, assistance by steam, air or gas, type of flare tips, etc. It aims at enabling smokeless and reliable operations and ensuring an efficient combustion of excess gases when flaring from non- routine operations. **Monitoring and reporting**: Continuous monitoring (measurements of gas flow and estimations of other

	parameters) of gas sent to flaring and associated parameters of combustion (e.g. flow gas mixture and heat content, ratio of assistance, velocity, purge gas flow rate, pollutant emissions). Reporting of flaring events makes it possible to use flaring ratio as a requirement included in the EMS and to prevent future events. Visual remote monitoring of the flare can also be carried out by using colour TV monitors during flare events
Choice of the catalyst promoter to avoid dioxins formation	During the regeneration of the reformer catalyst, organic chloride is generally needed for effective reforming catalyst performance (to re-establish the proper chloride balance in the catalyst and to assure the correct dispersion of the metals). The choice of the appropriate chlorinated compound will have an influence on the possibility of emissions of dioxins and furans
Solvent recovery for base oil production processes	The **solvent recovery** unit consists of a distillation step where the solvents are recovered from the oil stream and a stripping step (with steam or an inert gas) in a fractionator. The solvents used may be a mixture (DiMe) of 1,2-dichloroethane (DCE) and dichloromethane (DCM). In wax-processing units, solvent recovery (e.g. for DCE) is carried out using two systems: one for the deoiled wax and another one for the soft wax. Both consist of heat-integrated flashdrums and a vacuum stripper. Streams from the dewaxed oil and waxes product are stripped for removal of traces of solvents

1.21. Description of techniques for the prevention and control of emissions to water

1.21.1. Waste water pretreatment

Pretreatment of sour water streams before reuse or treatment	Send generated sour water (e.g. from distillation, cracking, coking units) to appropriate pretreatment (e.g. stripper unit)
Pretreatment of other waste water streams prior to treatment	To maintain treatment performance, appropriate pretreatment may be required

1.21.2. Waste water treatment

Removal of insoluble substances by recovering oil	These techniques generally include: - API Separators (APIs) - Corrugated Plate Interceptors (CPIs) - Parallel Plate Interceptors (PPIs) - Tilted Plate Interceptors (TPIs) - Buffer and/or equalisation tanks
Removal of insoluble substances by recovering suspended solid and dispersed oil	These techniques generally include: - Dissolved Gas Flotation (DGF) - Induced Gas Flotation (IGF) - Sand Filtration
Removal of soluble substances including	Biological treatment techniques may include: - Fixed bed systems

biological treatment and clarification	- Suspended bed systems. One of the most commonly used suspended bed system in refineries WWTP is the activated sludge process. Fixed bed systems may include a biofilter or trickling filter
Additional treatment step	A specific waste water treatment intended to complement the previous treatment steps e.g. for further reducing nitrogen or carbon compounds. Generally used where specific local requirements for water preservation exist.

Annex 2: Improvement Conditions

Based in the information in the Operators Regulation 60 Notice responses and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the BAT Conclusions are achieved by the installation. These additional improvement conditions are set out below - justifications for them are provided at the relevant section of this document.

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC12	<u>BAT Conclusion 6</u> The Operator shall submit a diffuse volatile organic compounds (VOCs) monitoring plan to the Environment Agency for written approval. • The nature of the material handled; • The sources of emissions and associated risks; • Justification of the monitoring techniques selected (e.g. sniffing, optical gas imaging, calculation); and • How the monitoring data will be recorded and reviewed. The plan shall take into account the appropriate techniques for VOC monitoring specified in BAT Conclusion 6 for the Refining of Mineral Oil and Gas. The Operator shall implement the approved plan and produce and submit an annual report on the results of the monitoring undertaken under the plan.	28/10/18

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC13	<u>BAT Conclusion 49</u> The Operator shall undertake an assessment of measures to reduce point source and fugitive emissions of VOCs from the storage of liquid hydrocarbons. The assessment shall take into account the techniques identified in BAT Conclusion 49 for the Refining of Mineral Oil and Gas, together with any other suitable reduction techniques. A written report summarising the findings shall be submitted to the Environment Agency, along with a timetable for implementing improvements. The Operator shall implement the improvements identified to a timetable agreed with the Environment Agency.	28/10/18
IC14	<u>BAT Conclusion 51</u> The Operator shall review all secondary containment measures, provided for liquid hydrocarbons that are stored or held on site, (excluding those bunds in scope of the COMAH Containment Policy). The review shall verify whether all storage tanks and areas designed for the storage of drums/IBCs and other portable liquid containers, within the installation; are sited on an impermeable base and with sufficient bunding as specified in the CIRIA C736 Guidance. Where containment provisions do not meet this standard, the Operator shall identify improvements, or alternative measures (such as additional primary or tertiary containment measures) to provide an equivalent level of protection. The Operator shall provide the Environment Agency with a written report of the review and shall implement identified improvements to a timescale agreed with the Environment Agency.	28/10/18

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC15	BAT Conclusions 55 & 56 The Operator shall submit a written gas management improvement plan to the Environment Agency for approval, which shall include, but not necessarily be limited to: • Identification of all gas vented from the installation; • Maximum quantity of gas released from each vent source (and how this measured) during each type of event, over three years or a representative period of operation; • The feasibility of recovering, reducing and/or treating the gas vented, including cost benefit analysis, of all available options to minimise environmental impacts as far as practicable. Options shall include, but not necessarily be limited to: - Vapour recovery; - Scrubbing; - Adsorption; and - Flaring. The plan shall contain dates for the implementation of any improvement measures identified. The plan shall be implemented in accordance with the Environment Agency's written approval.	30/11/18

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC16	The Operator shall destruct all electrical & instrumentation (E&I) cabling and instrumentation from vessels and tanks in Area 2 (Area 2 containing MEG tanks, condensate separator and water tanks, identified by sheet 2 on plan 580-104609 revision 2, as listed in Table S1.2 of this permit). The Operator shall complete final verification of positive isolation and complete preparation for dismantling in Area 2. The Operator shall physically remove all ancillary equipment and pipework in Area 2. Bulk vessels and tanks shall be cleaned and decontaminated and then left in place or removed. The Operator shall provide written confirmation to the Environment Agency on completion.	31/12/18
IC17	The Operator shall complete physical dismantling and demolition of all above ground structures and equipment in Areas 3 & 4. The Operator shall provide written confirmation to the Environment Agency on completion.	28/02/19

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC18	The Operator shall complete engineering to enable migration of all live process equipment (including fire & gas (F&G), emergency shut-down (ESD), and power supply) from existing control building into a new location in Area 1 (Area 1 containing the control building, identified by sheet 1 on plan 580-104609 revision 2 as listed in Table S1.2 of this permit). The Operator shall submit a proposed timetable for completion of migration of live process equipment from the existing control building to a new location. The Operator shall provide written confirmation to the Environment Agency on completion.	31/12/19
IC19	The Operator shall submit a proposed timetable for the removal of decommissioned equipment in the areas identified by sheets 5, 6, 7, 8 & 9 on plan 580-104609 revision 2 as listed in Table S1.2 of this permit. The Operator shall submit a proposed timetable for completion of decommissioning and removal of any remaining redundant equipment in Areas 1, 2, 3 & 4.	30/09/19