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/EP3833LY
The Operator is: Coryton Energy Company Limited
The Installation is: Coryton Power Station
This Variation Notice number is: EPR/EP3833LY/V003

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 best available techniques (BAT) conclusions.

We have reviewed the permit for this installation against the revised BAT Conclusions for large combustion plant published on 17th August 2017. 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 large combustion plant 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.)

APC	Air Pollution Control
BAT	Best Available Technique(s)
BAT-AEEL	BAT Associated Energy Efficiency Level
BAT-AEL	BAT Associated Emission Level
BATc	BAT conclusion
BREF	Best available techniques reference document
CCGT	Combined Cycle Gas Turbine
CEM	Continuous emissions monitor
CHP	Combined heat and power
CV	Calorific value
DAA	Directly associated activity – Additional activities necessary to be carried out to allow the principal activity to be carried out
DLN	Dry Low NOx burners
DLN-E	Dry Low NOx effective
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)
EWC	European waste catalogue
FSA	Food Standards Agency
IC	Improvement Condition
IED	Industrial Emissions Directive (2010/75/EU)
IPPCD	Integrated Pollution Prevention and Control Directive (2008/1/EC) – now superseded by IED
LCP	Large Combustion Plant subject to Chapter III of 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
PHE	Public Health England
SAC	Special Area of Conservation
SGN	Sector guidance note
TGN	Technical guidance note
TOC	Total Organic Carbon
WFD	Water Framework Directive (2000/60/EC)

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 Large Combustion Plant

We issued a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 1st May 2018 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 large combustion plant 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 17th August 2021, which will then ensure that operations meet the revised standard, or
- Justifies why standards will not be met by 17th August 2021, 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 61 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 61 Notice response from the Operator was received on 24/08/18.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review but not that it necessarily contained all the information we would need to complete that review.

We sent a request for information to the operator on 18/11/19 asking for further details regarding the following:

- BAT 9 – We asked for details of any testing provided by the gas supplier in relation to fuel characterisation.
- BAT 10 – We asked the operator to confirm whether the proposed upgrade allowing the LCPs to operate at lower loads had been completed.
- BAT 44 – We asked the operator to confirm the BAT-AEL and indicative BAT-AEL that they will meet for NOx and CO within the ranges set out in the BAT Conclusions as these had not been provided.
- Dry Low NOx (DLN) effectiveness – We asked the operator to confirm whether the limits specified for minimum start up load are also appropriate for DLN effectiveness.
- Thermal input – We asked the operator to confirm the net rated thermal input of each LCP.

The operator provided responses to this request on 25/11/19 and 06/12/19. The responses are included in the decision checklist regarding the BAT Conclusions in section 5 of this document.

We sent a further request on 27/01/20 regarding the actual figure for net electrical efficiency. The operator provided the figure in their response dated 25/02/20.

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.

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.

4 The key issues

The key issues arising during this permit review are:

- Emissions to air and the emission limits applied to the plant.
- The energy efficiency levels associated with the Best Available Techniques (BAT-AEELs).
- BAT 14 segregation of water streams.

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

4.1 Emissions to air and the emission limits applied to the plant

A number of general principles were applied during the permit review. These included:

- The upper value of the BAT AELs ranges specified were used unless use of the tighter limit was justified.
- The principle of no backsliding where existing limits in the permit were already tighter than those specified in the BREF, the existing permit limits were retained.
- Where a limit was specified in both IED Annex V and the BAT Conclusions for a particular reference period, the tighter limit was applied and in the majority of cases this was from the BAT Conclusions.

- Where AELs are indicative in the BAT Conclusions, these were applied unless adequate justification was provided by the operator to demonstrate that an alternative limit was more appropriate.
- For gas turbines where the IED specified that limits applied over 70% load and the BAT Conclusions specified that AELs applied when dry low NOx is effective (DLN-E), we have used DLN-E as a default across all monitoring requirements for NOx and CO.

The LCPs on site consist of:

LCP74 – 702 MWth input combined cycle gas turbine fuelled by natural gas
LCP75 – 702 MWth input combined cycle gas turbine fuelled by natural gas

The plant was put into operation before IED came into force and, therefore, the existing limits in the permit are from Part 1 Annex V applicable to existing plant.

The ELVs and AELs are based on the following operating regime:

- Unlimited hours operation.
- >600 MWth input
- <75% efficiency.

The following tables outline the limits that have been incorporated into the permit for LCP74 and LCP75, where these were derived from and the reference periods at which they apply. The emission limits refer to concentrations, expressed as mass of emitted substance per volume of flue-gas under the following standard conditions: dry gas at a temperature of 273,15 K, pressure of 101,3 kPa and 15% volume reference oxygen concentration if flue gases. The emission limits and monitoring requirements have been incorporated into Schedule 3 of the permit.

NOx limits (mg/Nm^3)						
Averaging	**IED (Annex V Part 2) - New**	**BREF (Table 25 BAT-c)**	**Expected permit limits**	**Basis**	**Limits apply**	**Monitoring**
Annual	**None**	**40**	**40**	BREF	When DLN is effective	Continuous
Monthly	**50**	**None**	**50**	IED	When DLN is effective	
Daily	**55**	**50**	**50** **60**	BREF and current permit	When DLN is effective MSUL/MSDL to baseload	
95th %ile of hr means	**100**	**None**	**100**	IED	When DLN is effective	

CO limits (mg/Nm^3)						
Averaging	**IED (Annex V Part 2) - New**	**BREF (Table 25 BAT-c)**	**Expected permit limits**	**Basis**	**Limits apply**	**Monitoring**
Annual	**None**	**30**	**100** **100**	BREF Review of CO emissions	When DLN is effective MSUL to base load	Continuous
Monthly	**100**	**None**	**100**	IED	When DLN is effective	
Daily	**110**	**None**	**100** **100**	Current permit	When DLN is effective MSUL/MSDL to baseload	
95th %ile of hr means	**200**	**None**	**200**	IED	When DLN is effective	

The annual CO limits are set based on a review of CO emissions provided by the operator. The operator has proposed two annual limits: 50 mg/Nm^3 when above 70% load and 100 mg/Nm^3 from start up to 70% load. However, as DLN effectiveness has been set at 50% load we cannot permit the higher limit from start up to DLN effectiveness and the lower limit after DLN effectiveness as these are not at the same load. Therefore, in order to allow the operator flexibility and to ensure low NOx emissions, we have set the annual average CO limit at 100 mg/m^3 from start up to base load and from DLN effectiveness.

The operator provided information to justify why the indicative BAT-AEL of 30 mg/Nm^3 annual CO could not be met. The turbines are generally over-hauled every 3 to 5 years and operation of the turbines results in wear in the turbine parts which affects combustion and hence emissions of CO. This occurs at lower loads and is exacerbated during the summer months where higher ambient temperatures affect combustion. The turbines are optimised for low CO at higher loads. Recently the site has only been required to operate at lower loads and forecasts for the generation sector would suggest that generation would be required for shorter periods and at low load. In order to meet the indicative BAT-AELs, the operator would have to reduce the flexible load capacity and this could impact on the commercial competiveness and, potentially, the viability of the plant.

The daily CO limit is based on that in the current permit as the Bref review does not allow backsliding on standards and emissions.

4.2 The energy efficiency levels associated with the Best Available Techniques Conclusions

An energy efficiency level associated with the best available techniques (BAT-AEEL) refers to the ratio between the combustion unit's net energy output(s) and the combustion unit's fuel/feedstock energy input at actual unit design. The net energy output(s) is determined at the combustion unit boundaries,

including auxiliary systems (e.g. flue-gas treatment systems), and for the unit operated at full load.

The table below sets out the BAT-AEELs specified in the LCP BAT Conclusions for the large combustion plant on the site and the energy efficiency levels confirmed through the Regulation 61 notice response. The Operator stated in the Regulation 61 response that the plant efficiency is greater than 50%. We asked the operator to provide an exact figure and the operator stated in response to our request that the net electrical efficiency is 54.4%. We consider this plant is BAT in relation to the AEELs.

BAT AEELs (%)			Plant efficiency (%)		
Net electrical efficiency	**Net total fuel utilisation**	**Net mechanical efficiency**	**Net electrical efficiency**	**Net total fuel utilisation**	**Net mechanical efficiency**
LCP74: existing CCGT ≥ 600MWth					
50 - 60	**None**	**None**	**54.4%**	**NA**	**NA**
LCP75: existing CCGT ≥ 600MWth					
50 - 60	**None**	**None**	**54.4%**	**NA**	**NA**

5 Decision checklist regarding relevant BAT Conclusions

BAT Conclusions for large combustion plant, were published by the European Commission on 17th August 2017. There are 75 BAT Conclusions. Only the BAT Conclusions relevant to the particular fuel type used on site have been replicated below.

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

The conditions in the permit through which the relevant BAT Conclusions are implemented include but are not limited to the following:

BAT Conclusion requirement topic	Permit condition(s)	Permit table(s)
Environmental Management System	1.1.1	S1.2
BAT AELs	3.1.1 and 3.5.1	S3.1a .
Monitoring	2.3, 3.5 and 3.6	S1.4, S1.5, S1.2, S3.1a
Energy efficiency	1.2 and 2.3	S3.4
Noise	3.4 and 2.3	S2.1
Other operating techniques	1.2	S1.2

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 Concn. 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
General			
1	**In order to improve the overall environmental performance, 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, and throughout its operating life; ix. application of sectoral benchmarking on a regular basis. Etc - see BAT Conclusions	CC	The operator has confirmed that their management system is accredited to ISO 14001 and this meets the requirements of points (i) to (xvi) of this BAT Conclusion.

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td>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></tr>
<tr><td>2</td><td>BAT is to determine the net electrical efficiency and/or the net total fuel utilisation and/or the net mechanical energy efficiency of the gasification, IGCC and/or combustion units by carrying out a performance test at full load (1), according to EN standards, after the commissioning of the unit and after each modification that could significantly affect the net electrical efficiency and/or the net total fuel utilisation and/or the net mechanical energy efficiency of the unit. 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.</td><td>CC</td><td>The operator stated that performance tests at full load are carried out by a performance engineer following every major inspection, overhaul of plant or as required if performance levels deviate from the standard degradation curve. The last test was carried out in April 2018.</td></tr>
<tr><td>3</td><td>BAT is to monitor key process parameters relevant for emissions to air and water including those given below.
<table>
<tr><th>Stream</th><th>Parameter(s)</th><th>Monitoring</th></tr>
<tr><td rowspan="3">Flue-gas</td><td>Flow</td><td>Periodic or continuous determination</td></tr>
<tr><td>Oxygen content, temperature, and pressure</td><td rowspan="2">Periodic or continuous measurement</td></tr>
<tr><td>Water vapour content (3)</td></tr>
<tr><td>Waste water from flue-gas treatment</td><td>Flow, pH, and temperature</td><td>Continuous measurement</td></tr>
</table></td><td>CC</td><td>The operator confirmed that all the relevant flue gas parameters are monitored continuously.</td></tr>
<tr><td>4</td><td>BAT is to monitor emissions to air with at least the 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>Substance/Parameter</th><th>Fuel/Process/Type of combustion plant</th><th>Combustion plant total rated thermal input</th><th>Standard(s) (4)</th><th>Minimum monitoring frequency (5)</th><th>Monitoring associated with</th></tr>
<tr><td>NH_3</td><td>— When SCR and/or SNCR is used</td><td>All sizes</td><td>Generic EN standards</td><td>Continuous (6) (7)</td><td>BAT 7</td></tr>
<tr><td>NO_X</td><td>— Coal and/or lignite including waste co-incineration</td><td>All sizes</td><td>Generic EN standards</td><td>Continuous (6) (8)</td><td>BAT 20
BAT 24
BAT 28
BAT 32
BAT 37
BAT 41</td></tr>
</table></td><td>CC</td><td>The operator has confirmed that NOx and CO are monitored continuously for each turbine and have specified appropriate standards.</td></tr>
</table>

BAT Concn. 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
		— Solid biomass and/or peat including waste co-incineration — HFO- and/or gas-oil-fired boilers and engines — Gas-oil-fired gas turbines — Natural-gas-fired boilers, engines, and turbines — Iron and steel process gases — Process fuels from the chemical industry — IGCC plants				BAT 42 BAT 43 BAT 47 BAT 48 BAT 56 BAT 64 BAT 65 BAT 73		
		— Combustion plants on offshore platforms	All sizes	EN 14792	Once every year [9]	BAT 53		
	N_2O	— Coal and/or lignite in circulating fluidised bed boilers — Solid biomass and/or peat in circulating fluidised bed boilers	All sizes	EN 21258	Once every year [10]	BAT 20 BAT 24		
	CO	— Coal and/or lignite including waste co-incineration — Solid biomass and/or peat including waste co-incineration — HFO- and/or gas-oil-fired boilers and engines — Gas-oil-fired gas turbines — Natural-gas-fired boilers, engines, and turbines	All sizes	Generic EN standards	Continuous [6] [8]	BAT 20 BAT 24 BAT 28 BAT 33 BAT 38 BAT 44 BAT 49 BAT 56 BAT 64 BAT 65 BAT 73		

BAT Concn. 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
		— Iron and steel process gases — Process fuels from the chemical industry — IGCC plants						
		— Combustion plants on offshore platforms	All sizes	EN 15058	Once every year [9]	BAT 54		
	SO_2	— Coal and/or lignite incl waste co-incineration — Solid biomass and/or peat incl waste co-incineration — HFO- and/or gas-oil-fired boilers — HFO- and/or gas-oil-fired engines — Gas-oil-fired gas turbines — Iron and steel process gases — Process fuels from the chemical industry in boilers — IGCC plants	All sizes	Generic EN standards and EN 14791	Continuous [6] [11] [12]	BAT 21 BAT 25 BAT 29 BAT 34 BAT 39 BAT 50 BAT 57 BAT 66 BAT 67 BAT 74		
	SO_3	— When SCR is used	All sizes	No EN standard available	Once every year	—		
	Gaseous chlorides, expressed as HCl	— Coal and/or lignite — Process fuels from the chemical industry in boilers	All sizes	EN 1911	Once every three months [6] [13] [14]	BAT 21 BAT 57		
		— Solid biomass and/or peat	All sizes	Generic EN standards	Continuous [15] [16]	BAT 25		
		— Waste co-incineration	All sizes	Generic EN standards	Continuous [6] [16]	BAT 66 BAT 67		
	HF	— Coal and/or lignite	All sizes	No EN standard available	Once every three months [6] [13] [14]	BAT 21 BAT 57		

BAT Concn. 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
		— Process fuels from the chemical industry in boilers						
		— Solid biomass and/or peat	All sizes	No EN standard available	Once every year	BAT 25		
		— Waste co-incineration	All sizes	Generic EN standards	Continuous [6] [16]	BAT 66 BAT 67		
	Dust	— Coal and/or lignite — Solid biomass and/or peat — HFO- and/or gas-oil-fired boilers — Iron and steel process gases — Process fuels from the chemical industry in boilers — IGCC plants — HFO- and/or gas-oil-fired engines — Gas-oil-fired gas turbines	All sizes	Generic EN standards and EN 13284-1 and EN 13284-2	Continuous [6] [17]	BAT 22 BAT 26 BAT 30 BAT 35 BAT 39 BAT 51 BAT 58 BAT 75		
		— Waste co-incineration	All sizes	Generic EN standards and EN 13284-2	Continuous	BAT 68 BAT 69		
	Metals and metalloids except mercury (As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Tl, V, Zn)	— Coal and/or lignite — Solid biomass and/or peat — HFO- and/or gas-oil-fired boilers and engines	All sizes	EN 14385	Once every year [18]	BAT 22 BAT 26 BAT 30		
		— Waste co-incineration	< 300 MW_{th}	EN 14385	Once every six months [13]	BAT 68 BAT 69		
			≥ 300 MW_{th}	EN 14385	Once every three months [19] [13]			
		— IGCC plants	≥ 100 MW_{th}	EN 14385	Once every year [18]	BAT 75		

BAT Concn. 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

Hg	— Coal and/or lignite including waste co-incineration	< 300 MW_{th}	EN 13211	Once every three months [13] [20]	BAT 23
		≥ 300 MW_{th}	Generic EN standards and EN 14884	Continuous [16] [21]	
	— Solid biomass and/or peat	All sizes	EN 13211	Once every year [22]	BAT 27
	— Waste co-incineration with solid biomass and/or peat	All sizes	EN 13211	Once every three months [13]	BAT 70
	— IGCC plants	≥ 100 MW_{th}	EN 13211	Once every year [23]	BAT 75
TVOC	— HFO- and/or gas-oil-fired engines — Process fuels from chemical industry in boilers	All sizes	EN 12619	Once every six months [13]	BAT 33 BAT 59
	— Waste co-incineration with coal, lignite, solid biomass and/or peat	All sizes	Generic EN standards	Continuous	BAT 71
Formaldehyde	— Natural-gas in spark-ignited lean-burn gas and dual fuel engines	All sizes	No EN standard available	Once every year	BAT 45
CH_4	— Natural-gas-fired engines	All sizes	EN ISO 25139	Once every year [24]	BAT 45
PCDD/F	— Process fuels from chemical industry in boilers — Waste co-incineration	All sizes	EN 1948-1, EN 1948-2, EN 1948-3	Once every six months [13] [25]	BAT 59 BAT 71

5	BAT is to monitor emissions to water from flue-gas treatment with at least the 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.	NA	There is no treatment of the flue gases.

Substance/Parameter	Standard(s)	Minimum monitoring frequency	Monitoring associated with

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td>
<table>
<tr><td colspan="2">Total organic carbon (TOC) ([26])</td><td>EN 1484</td><td>Once every month</td><td>BAT 15</td></tr>
<tr><td colspan="2">Chemical oxygen demand (COD) ([26])</td><td>No EN standard available</td><td></td><td></td></tr>
<tr><td colspan="2">Total suspended solids (TSS)</td><td>EN 872</td><td></td><td></td></tr>
<tr><td colspan="2">Fluoride (F^-)</td><td>EN ISO 10304-1</td><td></td><td></td></tr>
<tr><td colspan="2">Sulphate (SO_4^{2-})</td><td>EN ISO 10304-1</td><td></td><td></td></tr>
<tr><td colspan="2">Sulphide, easily released (S^{2-})</td><td>No EN standard available</td><td></td><td></td></tr>
<tr><td colspan="2">Sulphite (SO_3^{2-})</td><td>EN ISO 10304-3</td><td></td><td></td></tr>
<tr><td rowspan="8">Metals and metalloids</td><td>As</td><td rowspan="7">Various EN standards available (e.g. EN ISO 11885 or EN ISO 17294-2)</td><td rowspan="9"></td><td rowspan="9"></td></tr>
<tr><td>Cd</td></tr>
<tr><td>Cr</td></tr>
<tr><td>Cu</td></tr>
<tr><td>Ni</td></tr>
<tr><td>Pb</td></tr>
<tr><td>Zn</td></tr>
<tr><td>Hg</td><td>Various EN standards available (e.g. EN ISO 12846 or EN ISO 17852)</td></tr>
<tr><td colspan="2">Chloride (Cl^-)</td><td>Various EN standards available (e.g. EN ISO 10304-1 or EN ISO 15682)</td><td>—</td></tr>
<tr><td colspan="2">Total nitrogen</td><td>EN 12260</td><td>—</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>6</td><td>In order to improve the general environmental performance of combustion plants and to reduce emissions to air of CO and unburnt substances, BAT is to ensure optimised combustion and to use an appropriate combination of the techniques given below.
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Fuel blending and mixing</td><td>Ensure stable combustion conditions and/or reduce the emission of pollutants by mixing different qualities of the same fuel type</td><td>Generally applicable</td></tr>
</table>
</td><td>CC</td><td>The operator has confirmed that the following techniques are applied to improve general environmental performance:
b - Maintenance of the combustion system
c - Advanced control systems
d - Efficient design of the combustion equipment
e - Fuel choice - low sulphur natural gas.</td></tr>
</table>

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td>
<table>
<tr><td>b.</td><td>Maintenance of the combustion system</td><td>Regular planned maintenance according to suppliers' recommendations</td><td></td></tr>
<tr><td>c.</td><td>Advanced control system</td><td>See description in Section 8.1</td><td>The applicability to old combustion plants may be constrained by the need to retrofit the combustion system and/or control command system</td></tr>
<tr><td>d.</td><td>Good design of the combustion equipment</td><td>Good design of furnace, combustion chambers, burners and associated devices</td><td>Generally applicable to new combustion plants</td></tr>
<tr><td>e.</td><td>Fuel choice</td><td>Select or switch totally or partially to another fuel(s) with a better environmental profile (e.g. with low sulphur and/or mercury content) amongst the available fuels, including in start-up situations or when back-up fuels are used</td><td>Applicable within the constraints associated with the availability of suitable types of fuel with a better environmental profile as a whole, which may be impacted by the energy policy of the Member State, or by the integrated site's fuel balance in the case of combustion of industrial process fuels.
For existing combustion plants, the type of fuel chosen may be limited by the configuration and the design of the plant</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>7</td><td>In order to reduce emissions of ammonia to air from the use of selective catalytic reduction (SCR) and/or selective non-catalytic reduction (SNCR) for the abatement of NO_X emissions, BAT is to optimise the design and/or operation of SCR and/or SNCR (e.g. optimised reagent to NO_X ratio, homogeneous reagent distribution and optimum size of the reagent drops).
BAT-associated emission levels
The BAT-associated emission level (BAT-AEL) for emissions of NH_3 to air from the use of SCR and/or SNCR is < 3–10 mg/Nm^3 as a yearly average or average over the sampling period. The lower end of the range can be achieved when using SCR and the upper end of the range can be achieved when using SNCR without wet abatement techniques. In the case of plants combusting biomass and operating at variable loads as well as in the case of engines combusting HFO and/or gas oil, the higher end of the BAT-AEL range is 15 mg/Nm^3.</td><td>NA</td><td>No abatement is fitted.</td></tr>
<tr><td>8</td><td>In order to prevent or reduce emissions to air during normal operating conditions, BAT is to ensure, by appropriate design, operation and maintenance, that the emission abatement systems are used at optimal capacity and availability.</td><td>CC</td><td>The operator stated in their response to the notice:

The design of the gas turbine utilising dry low NOx burners ensures that emissions to air are maintained within permit requirements. In addition, maintenance</td></tr>
</table>

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td></td><td></td><td>is undertaken in accordance with OEM guidelines to ensure that turbine efficiency and emissions limits are maintained.</td></tr>
<tr><td>9</td><td>In order to improve the general environmental performance of combustion and/or gasification plants and to reduce emissions to air, BAT is to include the following elements in the quality assurance/quality control programmes for all the fuels used, as part of the environmental management system (see BAT 1):
(i) Initial full characterisation of the fuel used including at least the parameters listed below and in accordance with EN standards. ISO, national or other international standards may be used provided they ensure the provision of data of an equivalent scientific quality;
(ii) Regular testing of the fuel quality to check that it is consistent with the initial characterisation and according to the plant design specifications. The frequency of testing and the parameters chosen from the table below are based on the variability of the fuel and an assessment of the relevance of pollutant releases (e.g. concentration in fuel, flue-gas treatment employed);
(iii) Subsequent adjustment of the plant settings as and when needed and practicable (e.g. integration of the fuel characterisation and control in the advanced control system (see description in Section 8.1)).
Description
Initial characterisation and regular testing of the fuel can be performed by the operator and/or the fuel supplier. If performed by the supplier, the full results are provided to the operator in the form of a product (fuel) supplier specification and/or guarantee.
<table>
<tr><th>Fuel(s)</th><th>Substances/Parameters subject to characterisation</th></tr>
<tr><td rowspan="3">Biomass/peat</td><td>— LHV
— moisture</td></tr>
<tr><td>— Ash
— C, Cl, F, N, S, K, Na
— Metals and metalloids (As, Cd, Cr, Cu, Hg, Pb, Zn)</td></tr>
<tr><td></td></tr>
<tr><td rowspan="3">Coal/lignite</td><td>— LHV
— Moisture
— Volatiles, ash, fixed carbon, C, H, N, O, S</td></tr>
<tr><td>— Br, Cl, F</td></tr>
<tr><td></td></tr>
</table></td><td>CC</td><td>The operator stated that this is not applicable to natural gas fuels. Whilst detailed characterisation of the fuel is not required, the operator should still review data provided by the gas supplier. Therefore, we requested further information from the operator which was received on 25/11/19.

The operator says that the gas is analysed on site by means of a dedicated gas chromatograph and gas flow is measured by dedicated flow meters. There is a contract in place to inspect and validate the gas metering and chromatograph systems using appropriate standards and accredited standard gases on an annual basis. The contractor provides a report to the operator including any actions that are required.</td></tr>
</table>

BAT Concn. 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
	<table><tr><td></td><td>— Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn)</td></tr><tr><td>HFO</td><td>— Ash — C, S, N, Ni, V</td></tr><tr><td>Gas oil</td><td>— Ash — N, C, S</td></tr><tr><td>Natural gas</td><td>— LHV — CH_4, C_2H_6, C_3, C_4+, CO_2, N_2, Wobbe index</td></tr><tr><td>Process fuels from the chemical industry (27)</td><td>— Br, C, Cl, F, H, N, O, S — Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn)</td></tr><tr><td>Iron and steel process gases</td><td>— LHV, CH_4 (for COG), C_XH_Y (for COG), CO_2, H_2, N_2, total sulphur, dust, Wobbe index</td></tr><tr><td>Waste (28)</td><td>— LHV — Moisture — Volatiles, ash, Br, C, Cl, F, H, N, O, S — Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn)</td></tr></table>		
10	In order to reduce emissions to air and/or to water during other than normal operating conditions (OTNOC), BAT is to set up and implement a management plan as part of the environmental management system (see BAT 1), commensurate with the relevance of potential pollutant releases, that includes the following elements: — appropriate design of the systems considered relevant in causing OTNOC that may have an impact on emissions to air, water and/or soil (e.g. low-load design concepts for reducing the minimum start-up and shutdown loads for stable generation in gas turbines), — set-up and implementation of a specific preventive maintenance plan for these relevant systems, — review and recording of emissions caused by OTNOC and associated circumstances and implementation of corrective actions if necessary, — periodic assessment of the overall emissions during OTNOC (e.g. frequency of events, duration, emissions quantification/estimation) and implementation of corrective actions if necessary.	CC	Initially the operator stated that they had planned a low part load upgrade, but in response to our query on 25/11/19 they confirmed that this had not taken place. In response to our request for information regarding this BAT-C dated 31/12/19, the operator provided the following response on 10/01/20: We have two systems that ensure we recognise and act upon any operation of the plant outside of its normal operating conditions: Short Run Marginal Cost Review Process

BAT Concn. 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
			The Short Run Marginal Cost (SRMC) review process is the calculation methodology we employ in Intergen to determine how our plant is traded in the UK electricity market. It is also the management tool we use to ensure we are continually optimising plant performance and monitoring any operation outside of normal conditions . Performance data from our plant is the main component of the SRMC, but there are other commercial inputs too. The performance data includes cost for raw materials used during start-up and shut-down and running the plant at steady load (gas, chemicals and water, and also carbon allowances). Commercial data includes costs for using the gas transmission network, the electricity transmission network, and balancing charges on the electricity system. To manage the plant performance, we hold a monthly SRMC review meeting, where the Performance Engineer and Operations Manager at site submits Station SRMC data, based on live/recent historical operational data, to the central Asset Team and Business Planning and Analysis team. This data is reviewed in line with Business Plan expectations and any deviations are discussed/appropriate corrective actions agreed where required. On an annual basis a stretch target is applied to our Scorecard to drive SRMC improvements each year that improves plant efficiency and ensures we are continually striving to minimise our plant emissions. <u>Loss of Load Process</u> The purpose of the Loss of Load (LOL) process is to ensure the process for the investigation, improvement and analysis of failures occurring on Intergen assets

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td></td><td></td><td>is standardises and adhered to. The LOL process ensures that any abnormal operation of the plant that results in a loss of load/availability or potential loss of load/availability will be investigated. Each LOL event is recorded on the Business Impact Tracking System (BITS) and is reviewed the following morning at the Production meeting. Each event has a lead investigator assigned who assesses the abnormal condition and determines the root cause and the actions required to prevent re-occurrence.

The combination of the two systems of SRMC and LOL ensures that any abnormal operation conditions are identified and action plans put in place to reduce/prevent re-occurrence.</td></tr>
<tr><td>11</td><td>BAT is to appropriately monitor emissions to air and/or to water during OTNOC.
Description
The monitoring can be carried out by direct measurement of emissions or by monitoring of surrogate parameters if this proves to be of equal or better scientific quality than the direct measurement of emissions. Emissions during start-up and shutdown (SU/SD) may be assessed based on a detailed emission measurement carried out for a typical SU/SD procedure at least once every year, and using the results of this measurement to estimate the emissions for each and every SU/SD throughout the year.</td><td>CC</td><td>The operator has stated that all flue gas relevant parameters are monitored continuously during periods of OTNOC including start-ups and shut downs.</td></tr>
<tr><td>12</td><td>In order to increase the energy efficiency of combustion, gasification and/or IGCC units operated ≥ 1 500 h/yr, BAT is to use an appropriate combination of the techniques given below.
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Combustion optimisation</td><td>See description in Section 8.2. Optimising the combustion minimises the content of unburnt substances in the flue-gases and in solid combustion residues</td><td rowspan="2">Generally applicable</td></tr>
<tr><td>b.</td><td>Optimisation of the working medium conditions</td><td>Operate at the highest possible pressure and temperature of the working medium gas or steam, within the constraints associated with, for example, the control</td></tr>
</table></td><td>CC</td><td>The operator has stated that the following measures are implemented:
a. Use of a high performance monitoring and an advanced combustion optimisation system.
b. Operation at the highest possible temperatures & pressures giving due regard to NOx emissions.
c. Equipment utilises an Air Cooled Condenser under vacuum to optimise steam turbine efficiency.
d. Utilisation of dual speed drives where feasible.</td></tr>
</table>

BAT Concn. 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
			f. Preheating with heat recovered from feed water/steam is utilised. g. GTs utilises a computer based control system incorporating high performance monitoring. h. HRSG is fitted with feed water heaters/economisers. q. 'F' Class GT utilising high temperature materials. r. High Temperature (Approx. 575 degC) and pressure steam (Approx. 105 bar) used. In addition, the operator states that the other specified measures are not applicable to the type of plant or due to the age of the plant and local constraints.

		of NO_X emissions or the characteristics of energy demanded	
c.	Optimisation of the steam cycle	Operate with lower turbine exhaust pressure by utilisation of the lowest possible temperature of the condenser cooling water, within the design conditions	
d.	Minimisation of energy consumption	Minimising the internal energy consumption (e.g. greater efficiency of the feed-water pump)	
e.	Preheating of combustion air	Reuse of part of the heat recovered from the combustion flue-gas to preheat the air used in combustion	Generally applicable within the constraints related to the need to control NO_X emissions
f.	Fuel preheating	Preheating of fuel using recovered heat	Generally applicable within the constraints associated with the boiler design and the need to control NO_X emissions
g.	Advanced control system	See description in Section 8.2. Computerised control of the main combustion parameters enables the combustion efficiency to be improved	Generally applicable to new units. The applicability to old units may be constrained by the need to retrofit the combustion system and/or control command system
h.	Feed-water preheating using recovered heat	Preheat water coming out of the steam condenser with recovered heat, before reusing it in the boiler	Only applicable to steam circuits and not to hot boilers. Applicability to existing units may be limited due to constraints associated with the plant configuration and the amount of recoverable heat
i.	Heat recovery by cogeneration (CHP)	Recovery of heat (mainly from the steam system) for producing hot water/steam to be used in industrial processes/activities or in a public network for district heating. Additional heat recovery is possible from: — flue-gas — grate cooling — circulating fluidised bed	Applicable within the constraints associated with the local heat and power demand. The applicability may be limited in the case of gas compressors with an unpredictable operational heat profile

BAT Concn. 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
	j.	CHP readiness	See description in Section 8.2.	Only applicable to new units where there is a realistic potential for the future use of heat in the vicinity of the unit		
	k.	Flue-gas condenser	See description in Section 8.2.	Generally applicable to CHP units provided there is enough demand for low-temperature heat		
	l.	Heat accumulation	Heat accumulation storage in CHP mode	Only applicable to CHP plants. The applicability may be limited in the case of low heat load demand		
	m.	Wet stack	See description in Section 8.2.	Generally applicable to new and existing units fitted with wet FGD		
	n.	Cooling tower discharge	The release of emissions to air through a cooling tower and not via a dedicated stack	Only applicable to units fitted with wet FGD where reheating of the flue-gas is necessary before release, and where the unit cooling system is a cooling tower		
	o.	Fuel pre-drying	The reduction of fuel moisture content before combustion to improve combustion conditions	Applicable to the combustion of biomass and/or peat within the constraints associated with spontaneous combustion risks (e.g. the moisture content of peat is kept above 40 % throughout the delivery chain). The retrofit of existing plants may be restricted by the extra calorific value that can be obtained from the drying operation and by the limited retrofit possibilities offered by some boiler designs or plant configurations		
	p.	Minimisation of heat losses	Minimising residual heat losses, e.g. those that occur via the slag or those that can be reduced by insulating radiating sources	Only applicable to solid-fuel-fired combustion units and to gasification/IGCC units		
	q.	Advanced materials	Use of advanced materials proven to be capable of withstanding high operating temperatures and pressures and thus to achieve increased steam/combustion process efficiencies	Only applicable to new plants		

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td>
<table>
<tr><td>r.</td><td>Steam turbine upgrades</td><td>This includes techniques such as increasing the temperature and pressure of medium-pressure steam, addition of a low-pressure turbine, and modifications to the geometry of the turbine rotor blades</td><td>The applicability may be restricted by demand, steam conditions and/or limited plant lifetime</td></tr>
<tr><td>s.</td><td>Supercritical and ultra-supercritical steam conditions</td><td>Use of a steam circuit, including steam reheating systems, in which steam can reach pressures above 220,6 bar and temperatures above 374 °C in the case of supercritical conditions, and above 250 – 300 bar and temperatures above 580 – 600 °C in the case of ultra-supercritical conditions</td><td>Only applicable to new units of ≥ 600 MW_{th} operated > 4 000 h/yr.
Not applicable when the purpose of the unit is to produce low steam temperatures and/or pressures in process industries.
Not applicable to gas turbines and engines generating steam in CHP mode.
For units combusting biomass, the applicability may be constrained by high-temperature corrosion in the case of certain biomasses</td></tr>
</table>
</td><td></td><td></td></tr>
<tr><td>13</td><td>In order to reduce water usage and the volume of contaminated waste water discharged, BAT is to use one or both of the techniques given below.
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Water recycling</td><td>Residual aqueous streams, including run-off water, from the plant are reused for other purposes. The degree of recycling is limited by the quality requirements of the recipient water stream and the water balance of the plant</td><td>Not applicable to waste water from cooling systems when water treatment chemicals and/or high concentrations of salts from seawater are present</td></tr>
<tr><td>b.</td><td>Dry bottom ash handling</td><td>Dry, hot bottom ash falls from the furnace onto a mechanical conveyor system and is cooled down by ambient air. No water is used in the process.</td><td>Only applicable to plants combusting solid fuels.
There may be technical restrictions that prevent retrofitting to existing combustion plants</td></tr>
</table>
</td><td>CC</td><td>The operator provided the following regarding the techniques that are used or are not applicable:
a. Plant is designed to take in water of drinking standard to make into demineralised water. Process water is reused in the condensate return steam system and where possible, boiler blowdown water is recycled in the cooling water system. Cooling tower water is not suitable for recycling as water treatment chemicals are present. Waste and run off water are also not suitable for recycling as they do not meet the necessary quality requirements.
b. This is not applicable as the plant is gas fired and dry bottom ash handling is not required.</td></tr>
</table>

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td>14</td><td>In order to prevent the contamination of uncontaminated waste water and to reduce emissions to water, BAT is to segregate waste water streams and to treat them separately, depending on the pollutant content.
Description
Waste water streams that are typically segregated and treated include surface run-off water, cooling water, and waste water from flue-gas treatment.
Applicability
The applicability may be restricted in the case of existing plants due to the configuration of the drainage systems.</td><td>NC</td><td>Not in line with BAT due to the configuration of the drainage system on site. The plant does not have a direct sewage connection therefore cannot segregate waste. All process water, site sewage and surface drainage accumulates in the onsite drainage system and is treated accordingly before being discharged. Outfall/surface water is continuously monitored for pH and temperature. Periodic samples are tested for suspended solids, total hydrocarbons, free chlorine, mercury and cadmium.</td></tr>
<tr><td>15</td><td>In order to reduce emissions to water from flue-gas treatment, BAT is to use an appropriate combination of the techniques given below, and to use secondary techniques as close as possible to the source in order to avoid dilution.
<table>
<tr><th colspan="2">Technique</th><th>Typical pollutants prevented/abated</th><th>Applicability</th></tr>
<tr><td colspan="4">Primary techniques</td></tr>
<tr><td>a.</td><td>Optimised combustion (see BAT 6) and flue-gas treatment systems (e.g. SCR/SNCR, see BAT 7)</td><td>Organic compounds, ammonia (NH_3)</td><td>Generally applicable</td></tr>
<tr><td colspan="4">Secondary techniques [29]</td></tr>
<tr><td>b.</td><td>Adsorption on activated carbon</td><td>Organic compounds, mercury (Hg)</td><td>Generally applicable</td></tr>
<tr><td>c.</td><td>Aerobic biological treatment</td><td>Biodegradable organic compounds, ammonium (NH_4^+)</td><td>Generally applicable for the treatment of organic compounds. Aerobic biological treatment of ammonium (NH_4^+) may not be applicable in the case of high chloride concentrations (i.e. around 10 g/l)</td></tr>
<tr><td>d.</td><td>Anoxic/anaerobic biological treatment</td><td>Mercury (Hg), nitrate (NO_3^-), nitrite (NO_2^-)</td><td>Generally applicable</td></tr>
<tr><td>e.</td><td>Coagulation and flocculation</td><td>Suspended solids</td><td>Generally applicable</td></tr>
<tr><td>f.</td><td>Crystallisation</td><td>Metals and metalloids, sulphate (SO_4^{2-}), fluoride (F^-)</td><td>Generally applicable</td></tr>
</table></td><td>NA</td><td>No flue gas treatment is required.</td></tr>
</table>

BAT Concn. 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

g.	Filtration (e.g. sand filtration, microfiltration, ultrafiltration)	Suspended solids, metals	Generally applicable
h.	Flotation	Suspended solids, free oil	Generally applicable
i.	Ion exchange	Metals	Generally applicable
j.	Neutralisation	Acids, alkalis	Generally applicable
k.	Oxidation	Sulphide (S^{2-}), sulphite (SO_3^{2-})	Generally applicable
l.	Precipitation	Metals and metalloids, sulphate (SO_4^{2-}), fluoride (F^-)	Generally applicable
m.	Sedimentation	Suspended solids	Generally applicable
n.	Stripping	Ammonia (NH_3)	Generally applicable

The BAT-AELs refer to direct discharges to a receiving water body at the point where the emission leaves the installation.

BAT-AELs for direct discharges to a receiving water body from flue-gas treatment

Substance/Parameter		BAT-AELs
		Daily average
Total organic carbon (TOC)		20–50 mg/l [30] [31] [32]
Chemical oxygen demand (COD)		60–150 mg/l [30] [31] [32]
Total suspended solids (TSS)		10–30 mg/l
Fluoride (F^-)		10–25 mg/l [32]
Sulphate (SO_4^{2-})		1,3–2,0 g/l [32] [33] [34] [35]
Sulphide (S^{2-}), easily released		0,1–0,2 mg/l [32]
Sulphite (SO_3^{2-})		1–20 mg/l [32]
Metals and metalloids	As	10–50 µg/l
	Cd	2–5 µg/l
	Cr	10–50 µg/l
	Cu	10–50 µg/l
	Hg	0,2–3 µg/l
	Ni	10–50 µg/l
	Pb	10–20 µg/l
	Zn	50–200 µg/l

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td>16</td><td>In order to reduce the quantity of waste sent for disposal from the combustion and/or gasification process and abatement techniques, BAT is to organise operations so as to maximise, in order of priority and taking into account life-cycle thinking:
(a) waste prevention, e.g. maximise the proportion of residues which arise as by-products;
(b) waste preparation for reuse, e.g. according to the specific requested quality criteria;
(c) waste recycling;
(d) other waste recovery (e.g. energy recovery),
by implementing an appropriate combination of techniques such as:
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Generation of gypsum as a by-product</td><td>Quality optimisation of the calcium-based reaction residues generated by the wet FGD so that they can be used as a substitute for mined gypsum (e.g. as raw material in the plasterboard industry). The quality of limestone used in the wet FGD influences the purity of the gypsum produced</td><td>Generally applicable within the constraints associated with the required gypsum quality, the health requirements associated to each specific use, and by the market conditions</td></tr>
<tr><td>b.</td><td>Recycling or recovery of residues in the construction sector</td><td>Recycling or recovery of residues (e.g. from semi-dry desulphurisation processes, fly ash, bottom ash) as a construction material (e.g. in road building, to replace sand in concrete production, or in the cement industry)</td><td>Generally applicable within the constraints associated with the required material quality (e.g. physical properties, content of harmful substances) associated to each specific use, and by the market conditions</td></tr>
<tr><td>c.</td><td>Energy recovery by using waste in the fuel mix</td><td>The residual energy content of carbon-rich ash and sludges generated by the combustion of coal, lignite, heavy fuel oil, peat or biomass can be recovered for example by mixing with the fuel</td><td>Generally applicable where plants can accept waste in the fuel mix and are technically able to feed the fuels into the combustion chamber</td></tr>
<tr><td>d.</td><td>Preparation of spent catalyst for reuse</td><td>Preparation of catalyst for reuse (e.g. up to four times for SCR catalysts) restores some or all of the original performance, extending the service life of the catalyst to several decades. Preparation of spent catalyst for reuse is integrated in a catalyst management scheme</td><td>The applicability may be limited by the mechanical condition of the catalyst and the required performance with respect to controlling NO_X and NH_3 emissions</td></tr>
</table></td><td>NA</td><td>The plant is fuelled by natural gas and there is no abatement equipment fitted, so no waste is produced from the combustion.</td></tr>
</table>

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td>17</td><td>In order to reduce noise emissions, BAT is to use one or a combination of the techniques given below.
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Operational measures</td><td>These include:
— improved inspection and maintenance of equipment
— closing of doors and windows of enclosed areas, if possible
— equipment operated by experienced staff
— avoidance of noisy activities at night, if possible
— provisions for noise control during maintenance activities</td><td>Generally applicable</td></tr>
<tr><td>b.</td><td>Low-noise equipment</td><td>This potentially includes compressors, pumps and disks</td><td>Generally applicable when the equipment is new or replaced</td></tr>
<tr><td>c.</td><td>Noise attenuation</td><td>Noise propagation can be reduced by inserting obstacles between the emitter and the receiver. Appropriate obstacles include protection walls, embankments and buildings</td><td>Generally applicable to new plants. In the case of existing plants, the insertion of obstacles may be restricted by lack of space</td></tr>
<tr><td>d.</td><td>Noise-control equipment</td><td>This includes:
— noise-reducers
— equipment insulation
— enclosure of noisy equipment
— soundproofing of buildings</td><td>The applicability may be restricted by lack of space</td></tr>
<tr><td>e.</td><td>Appropriate location of equipment and buildings</td><td>Noise levels can be reduced by increasing the distance between the emitter and the receiver and by using buildings as noise screens</td><td>Generally applicable to new plant</td></tr>
</table></td><td>CC</td><td>The operator has stated that the following techniques are used:
a. Routine maintenance is carried out in line with OEM requirements. Plant is operated by experienced staff and doors/windows are closed wherever possible to reduce noise.
b. Low-noise equipment installed.
c. Noise attenuation is in place where required.
d. Gas and Steam turbines housed inside a building.
e. No sensitive noise receptors or residential dwellings within 3 miles distance from plant.</td></tr>
<tr><td colspan="4">Combustion of solid fuels only</td></tr>
<tr><td>18 - 27</td><td>BAT conclusions for the combustion of solid fuels</td><td>NA</td><td>The LCP combusts natural gas.</td></tr>
<tr><td colspan="4">Combustion of liquid fuels</td></tr>
</table>

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td>Table 13, 28-39</td><td>BAT Conclusions for the combustion of liquid fuels</td><td>NA</td><td>The LCP combusts natural gas.</td></tr>
<tr><td colspan="4">Combustion of gaseous fuels</td></tr>
<tr><td>40</td><td>In order to increase the energy efficiency of natural gas combustion, BAT is to use an appropriate combination of the techniques given in BAT 12 and below.
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Combined cycle</td><td>See description in Section 8.2</td><td>Generally applicable to new gas turbines and engines except when operated < 1 500 h/yr.
Applicable to existing gas turbines and engines within the constraints associated with the steam cycle design and the space availability.
Not applicable to existing gas turbines and engines operated < 1 500 h/yr.
Not applicable to mechanical drive gas turbines operated in discontinuous mode with extended load variations and frequent start-ups and shutdowns.
Not applicable to boilers</td></tr>
</table>
BAT-associated energy efficiency levels (BAT-AEELs) for the combustion of natural gas
<table>
<tr><th rowspan="2">Type of combustion unit</th><th colspan="5">BAT-AEELs ([136]) ([137])</th></tr>
<tr><th colspan="2">Net electrical efficiency (%)</th><th>Net total fuel utilisation (%) ([138]) ([139])</th><th colspan="2">Net mechanical energy efficiency (%) ([139]) ([140])</th></tr>
<tr><th>New unit</th><th>Existing unit</th><th></th><th>New unit</th><th>Existing unit</th></tr>
<tr><td>Gas engine</td><td>39,5–44 ([141])</td><td>35–44 ([141])</td><td>56–85 ([141])</td><td colspan="2">No BAT-AEEL.</td></tr>
<tr><td>Gas-fired boiler</td><td>39–42,5</td><td>38–40</td><td>78–95</td><td colspan="2">No BAT-AEEL.</td></tr>
<tr><td>Open cycle gas turbine, ≥ 50 MWth</td><td>36–41,5</td><td>33–41,5</td><td>No BAT-AEEL</td><td>36,5–41</td><td>33,5–41</td></tr>
<tr><td colspan="6">Combined cycle gas turbine (CCGT)</td></tr>
<tr><td>CCGT, 50–600 MW_{th}</td><td>53–58,5</td><td>46–54</td><td>No BAT-AEEL</td><td colspan="2">No BAT-AEEL</td></tr>
<tr><td>CCGT, ≥ 600 MW_{th}</td><td>57–60,5</td><td>50–60</td><td>No BAT-AEEL</td><td colspan="2">No BAT-AEEL</td></tr>
</table></td><td>CC</td><td>Methods identified in BAT 12 utilised on a Combined Cycle Power Station consisting of 2 Gas Turbine Units with Heat Recovery Steam Generators to utilise heat from flue gas into steam for use in the Steam Turbine.

In response to the Regulation 61 notice the operator stated that net electrical efficiency was greater than 50%. We asked for a specific number and the operator responded to our request on 25/02/20 and confirmed that the net electrical efficiency is 54.4%. This is within the range of 50 -60% for LCPs greater than 600MWth input.</td></tr>
</table>

BAT Concn. 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
	CHP CCGT, 50–600 MW_{th} | 53–58,5 | 46–54 | 65–95 | No BAT-AEEL CHP CCGT, ≥ 600 MW_{th} | 57–60,5 | 50–60 | 65–95 | No BAT-AEEL		
41	In order to prevent or reduce NO_X emissions to air from the combustion of natural gas in boilers, BAT is to use one or a combination of the techniques given below. a. Air and/or fuel staging — See descriptions in Section 8.3. Air staging is often associated with low-NO_X burners — Generally applicable b. Flue-gas recirculation — See description in Section 8.3 c. Low-NO_X burners (LNB) d. Advanced control system — See description in Section 8.3. This technique is often used in combination with other techniques or may be used alone for combustion plants operated < 500 h/yr — The applicability to old combustion plants may be constrained by the need to retrofit the combustion system and/or control command system e. Reduction of the combustion air temperature — See description in Section 8.3 — Generally applicable within the constraints associated with the process needs f. Selective non–catalytic reduction (SNCR) — Not applicable to combustion plants operated < 500 h/yr with highly variable boiler loads. The applicability may be limited in the case of combustion plants operated between 500 h/yr and 1 500 h/yr with highly variable boiler loads g. Selective catalytic reduction (SCR) — Not applicable to combustion plants operated < 500 h/yr. Not generally applicable to combustion plants of < 100 MW_{th}. There may be technical and economic restrictions for retrofitting existing combustion plants operated between 500 h/yr and 1 500 h/yr	NA	The LCP is a combined cycle gas turbine, not boilers.

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td>42</td><td>In order to prevent or reduce NO_X emissions to air from the combustion of natural gas in gas turbines, BAT is to use one or a combination of the techniques given below.
<table>
<tr><th colspan="2">Technique</th><th>Description</th><th>Applicability</th></tr>
<tr><td>a.</td><td>Advanced control system</td><td>See description in Section 8.3.
This technique is often used in combination with other techniques or may be used alone for combustion plants operated < 500 h/yr</td><td>The applicability to old combustion plants may be constrained by the need to retrofit the combustion system and/or control command system</td></tr>
<tr><td>b.</td><td>Water/steam addition</td><td rowspan="2">See description in Section 8.3</td><td>The applicability may be limited due to water availability</td></tr>
<tr><td>c.</td><td>Dry low-NO_X burners (DLN)</td><td>The applicability may be limited in the case of turbines where a retrofit package is not available or when water/steam addition systems are installed</td></tr>
<tr><td>d.</td><td>Low-load design concept</td><td>Adaptation of the process control and related equipment to maintain good combustion efficiency when the demand in energy varies, e.g. by improving the inlet airflow control capability or by splitting the combustion process into decoupled combustion stages</td><td>The applicability may be limited by the gas turbine design</td></tr>
<tr><td>e.</td><td>Low-NO_X burners (LNB)</td><td rowspan="2">See description in Section 8.3</td><td>Generally applicable to supplementary firing for heat recovery steam generators (HRSGs) in the case of combined-cycle gas turbine (CCGT) combustion plants</td></tr>
<tr><td>f.</td><td>Selective catalytic reduction (SCR)</td><td>Not applicable in the case of combustion plants operated < 500 h/yr.
Not generally applicable to existing combustion plants of < 100 MW_{th}.
Retrofitting existing combustion plants may be constrained by the availability of sufficient space.
There may be technical and economic restrictions for retrofitting existing combustion</td></tr>
</table></td><td>CC</td><td>The operator has confirmed that the following techniques are used:

a. Use of an Advanced Control System and high performance monitoring.
b. Water/Steam Addition - N/A as C is already installed.
c. Dry low-NOx Burners installed.
d. Low Load design concept - upgrade planned for 2019 (subject to internal approval).
e. Low NOx burners - N/A as no duct burners installed.
f. Selective catalytic reduction - Not installed and unable to retrofit due to availability of space.

Dry low-NOx system is effective at MSUL when 2 out of the 3 following criteria have been met:-
- Fuel flow >7.5 kg/s
- Turbine Exhaust Gas Temperature >600 ºC
- Variable Inlet Guide Vane Angle >40 ºC

For each unit within the LCP in terms of:-
(i) Output Load in MW is approximately 120 MW.
(ii) Output load as a percentage of the rated thermal output of the combustion plant is approximately 50%.

The operator confirmed that the above load and percentage can be used as DLN effectiveness.</td></tr>
</table>

BAT Concn. 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
			plants operated between 500 h/yr and 1 500 h/yr
43	In order to prevent or reduce NO_X emissions to air from the combustion of natural gas in engines, BAT is to use one or a combination of the techniques given below. **Technique** / **Description** / **Applicability** a. Advanced control system — See description in Section 8.3. This technique is often used in combination with other techniques or may be used alone for combustion plants operated < 500 h/yr — The applicability to old combustion plants may be constrained by the need to retrofit the combustion system and/or control command system b. Lean-burn concept — See description in Section 8.3. Generally used in combination with SCR — Only applicable to new gas-fired engines c. Advanced lean-burn concept — See descriptions in Section 8.3 — Only applicable to new spark plug ignited engines d. Selective catalytic reduction (SCR) — Retrofitting existing combustion plants may be constrained by the availability of sufficient space. Not applicable to combustion plants operated < 500 h/yr. There may be technical and economic restrictions for retrofitting existing combustion plants operated between 500 h/yr and 1 500 h/yr	NA	The LCPs are gas turbines and not gas engines.
44	In order to prevent or reduce CO emissions to air from the combustion of natural gas, BAT is to ensure optimised combustion and/or to use oxidation catalysts. ***Description* - See descriptions in Section 8.3.** **BAT-associated emission levels (BAT-AELs) for NO_X emissions to air from the combustion of natural gas in gas turbines** **Type of combustion plant** / **Combustion plant total rated thermal input (MW_{th})** / **BAT-AELs (mg/Nm^3) (142) (143)**: **Yearly average (144) (145)** / **Daily average or average over the sampling period** **Open-cycle gas turbines (OCGTs) (146) (147)**	CC	The operator states that high performance monitoring is used and an Advanced Control System is in place. The operator had not provided any proposed BAT-AELs for NOx or indicative BAT-AELs for CO in their Regulation 61 response. We asked for their proposed limits which were provided on 27/11/19 and 06/12/19. The operator confirmed that the BAT-AELs for NOx will be met. However, they did not confirm what limit

BAT Concn. 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

New OCGT	≥ 50	15–35	25–50
Existing OCGT (excluding turbines for mechanical drive applications) — All but plants operated < 500 h/yr	≥ 50	15–50	25–55 ([148])

Combined-cycle gas turbines (CCGTs) ([146]) ([149])

New CCGT	≥ 50	10–30	15–40
Existing CCGT with a net total fuel utilisation of < 75 %	≥ 600	10–40	18–50
Existing CCGT with a net total fuel utilisation of ≥ 75 %	≥ 600	10–50	18–55 ([150])
Existing CCGT with a net total fuel utilisation of < 75 %	50–600	10–45	35–55
Existing CCGT with a net total fuel utilisation of ≥ 75 %	50–600	25–50 ([151])	35–55 ([152])

Open- and combined-cycle gas turbines

Gas turbine put into operation no later than 27 November 2003, or existing gas turbine for emergency use and operated < 500 h/yr	≥ 50	No BAT-AEL	60–140 ([153]) ([154])
Existing gas turbine for mechanical drive applications — All but plants operated < 500 h/yr	≥ 50	15–50 ([155])	25–55 ([156])

As an indication, the yearly average CO emission levels for each type of existing combustion plant operated ≥ 1 500 h/yr and for each type of new combustion plant will generally be as follows:

within the range was proposed. Therefore, we have set the limit as that at the top of the range for the yearly average.

The operator has provided a review of emissions of CO to justify their proposed two tier limits for the yearly average. These are 100 mg/Nm^3 for MSUL to 70% load and 50 mg/Nm^3 above 70% load. We have reviewed the information and agree with these proposed limits, but have set the limit at 100 mg/Nm^3 for MSUL to 70% and from DLN effectiveness, as this is set at 50%. Further detail is provided in section 4.1 above.

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td>
— New OCGT of ≥ 50 MW_{th}: < 5–40 mg/Nm^3. For plants with a net electrical efficiency (EE) greater than 39 %, a correction factor may be applied to the higher end of this range, corresponding to [higher end] × EE/39, where EE is the net electrical energy efficiency or net mechanical energy efficiency of the plant determined at ISO baseload conditions.
— Existing OCGT of ≥ 50 MW_{th} (excluding turbines for mechanical drive applications): < 5–40 mg/Nm^3. The higher end of this range will generally be 80 mg/Nm^3 in the case of existing plants that cannot be fitted with dry techniques for NO_X reduction, or 50 mg/Nm^3 for plants that operate at low load.
— New CCGT of ≥ 50 MW_{th}: < 5–30 mg/Nm^3. For plants with a net electrical efficiency (EE) greater than 55 %, a correction factor may be applied to the higher end of the range, corresponding to [higher end] × EE/55, where EE is the net electrical energy efficiency of the plant determined at ISO baseload conditions.
— Existing CCGT of ≥ 50 MW_{th}: < 5–30 mg/Nm^3. The higher end of this range will generally be 50 mg/Nm^3 for plants that operate at low load.
— Existing gas turbines of ≥ 50 MW_{th} for mechanical drive applications: < 5–40 mg/Nm^3. The higher end of the range will generally be 50 mg/Nm^3 when plants operate at low load.
In the case of a gas turbine equipped with DLN burners, these indicative levels correspond to when the DLN operation is effective.
BAT-associated emission levels (BAT-AELs) for NO_X emissions to air from the combustion of natural gas in boilers and engines
<table>
<tr><th rowspan="3">Type of combustion plant</th><th colspan="4">BAT-AELs (mg/Nm^3)</th></tr>
<tr><th colspan="2">Yearly average (157)</th><th colspan="2">Daily average or average over the sampling period</th></tr>
<tr><th>New plant</th><th>Existing plant (158)</th><th>New plant</th><th>Existing plant (159)</th></tr>
<tr><td>Boiler</td><td>10–60</td><td>50–100</td><td>30–85</td><td>85–110</td></tr>
<tr><td>Engine (160)</td><td>20–75</td><td>20–100</td><td>55–85</td><td>55–110 (161)</td></tr>
</table>
As an indication, the yearly average CO emission levels will generally be:
— < 5–40 mg/Nm^3 for existing boilers operated ≥ 1 500 h/yr,
— < 5–15 mg/Nm^3 for new boilers,
— 30–100 mg/Nm^3 for existing engines operated ≥ 1 500 h/yr and for new engines.
</td><td></td><td></td></tr>
<tr><td>45</td><td>In order to reduce non-methane volatile organic compounds (NMVOC) and methane (CH_4) emissions to air from the combustion of natural gas in spark-ignited lean-burn gas engines, BAT is to ensure optimised combustion and/or to use oxidation catalysts.
Description</td><td>NA</td><td>The LCPs are gas turbines and not engines.</td></tr>
</table>

<table>
<tr><th>BAT Concn. 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></tr>
<tr><td></td><td>See descriptions in Section 8.3. Oxidation catalysts are not effective at reducing the emissions of saturated hydrocarbons containing less than four carbon atoms.
BAT-associated emission levels (BAT-AELs) for formaldehyde and CH_4 emissions to air from the combustion of natural gas in a spark-ignited lean-burn gas engine
<table>
<tr><th rowspan="4">Combustion plant total rated thermal input (MW_{th})</th><th colspan="3">BAT-AELs (mg/Nm^3)</th></tr>
<tr><th>Formaldehyde</th><th colspan="2">CH_4</th></tr>
<tr><th colspan="3">Average over the sampling period</th></tr>
<tr><th>New or existing plant</th><th>New plant</th><th>Existing plant</th></tr>
<tr><td>≥ 50</td><td>5–15 (162)</td><td>215–500 (163)</td><td>215–560 (162) (163)</td></tr>
</table></td><td></td><td></td></tr>
<tr><td>46 - 51</td><td>BAT conclusions for the combustion of iron and steel process gases</td><td>NA</td><td>The LCP does not combust iron and steel process gases.</td></tr>
<tr><td>52 - 54</td><td>BAT conclusions for the combustion of gaseous and/or liquid fuels on offshore platforms</td><td>NA</td><td>The LCP is not on an offshore platform.</td></tr>
<tr><td>55 - 59</td><td>BAT conclusions for the combustion of process fuels from the chemical industry</td><td>NA</td><td>The LCP does not combust process fuels form the chemical industry.</td></tr>
<tr><td>60 - 71</td><td>BAT conclusions for the co-incineration of waste</td><td>NA</td><td>The LCP is not an incinerator.</td></tr>
<tr><td>72 – 75</td><td>BAT conclusions for gasification</td><td>NA</td><td>The LCP is not a gasifier.</td></tr>
</table>

6. Review and assessment of derogation requests made by the operator in relation to BAT Conclusions which include an associated emission level (AEL) value

The IED enables a competent authority to allow derogations from BAT AELs stated in BAT Conclusions under specific circumstances as detailed under Article 15(4):

By way of derogation from paragraph 3, and without prejudice to Article 18, the competent authority may, in specific cases, set less strict emission limit values. Such a derogation may apply only 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 compared to the environmental benefits due to:

(a) the geographical location or the local environmental conditions of the installation concerned; or

(b) the technical characteristics of the installation concerned.

As part of their Regulation 61 Note response, the operator has not requested a derogation from compliance with any AEL values.

7. Emissions to Water

The consolidated permit incorporates the current discharge to controlled waters identified as W1.

There are no BAT AELs specified in the BAT Conclusions for this type of plant. There are also no additional treatment options identified as BAT for the installation. We have therefore not carried out any additional assessment of the emissions to water as part of this review.

BAT 14 requires operators to separate uncontaminated and contaminated surface water. There is no sewer connection at the site and the operator has confirmed that this is still the case. Although all surface water and process effluent are discharged to the River Thames together, uncontaminated surface water does not pass through the treatment system so the operator is not relying on dilution in order to meet the limits set out in the permit.

Therefore, although the site is not strictly compliant with BAT 14, the BAT-C does allow deviation from this BAT for existing plant due to the configuration of the drainage system. Therefore, we consider that in this respect, the site can be considered to be compliant with BAT 14.

8 Additional IED Chapter II requirements:

In the event of a black out National Grid would call on combustion plant to operate and may require them to do so outside their permitted conditions. We have dedicated black start plant and they are permitted to run as such but this scenario is relevant to the rest of the large combustion plant which could be called depending on the circumstances.

A risk assessment will be carried out by Energy UK/Joint Environmental Programme on behalf of Large Combustion Plant connected to the National Transmission System. Air emissions modelling will be based on generic black start scenarios to establish whether they have the potential to have local impact on the environment or not (on a national basis). If the modelling demonstrates that no significant impacts are likely, the plant can operate under condition 2.3.9. This conditions allows the hourly ELVs for plants operating under a black start instruction to be discounted for the purpose of reporting. We would also require there to be a procedure in place for minimisation of emissions in the case of a black start event and for reporting in the event of a black start. This modelling and the procedures have not been agreed in advance of the issue of the permit review and therefore a condition linking back to an improvement condition have been included in the permit.

9 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 application, supporting information and notice.

Aspect considered	Decision
Receipt of application	
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 application that we consider to be confidential.
The site	
Biodiversity, heritage, landscape and nature conservation	The application 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/habitat has not been carried out as part of the permit review process. We consider that the review will not affect the features of the sites/species/habitat as the conditions will provide at least the same level of protection as those in the previous permit and in some cases will provide a higher level of protection to those in the previous permit. We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.
Operating techniques	
General operating techniques	We have reviewed the techniques used by the operator where they are relevant to the BAT Conclusions and compared these with the relevant guidance notes. The permit conditions ensure compliance with the relevant BREF, BAT Conclusions. The ELVs deliver compliance with the BAT-AELs.
Permit conditions	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide at least the same level of protection as those in the previous permit and in some cases will provide a higher level of protection to those in the previous permit.

Aspect considered	Decision
Changes to the permit conditions due to an Environment Agency initiated variation	We have varied the permit as stated in the variation notice.
Improvement programme	We have imposed an improvement programme (IC10) to ensure that the operator provides a report that assesses the impact of emissions during operation under Black Start and provides a methodology for minimising impact during Black Start operation and for reporting instances of Black Start operation, as detailed in section 9 above. We have also removed the completed improvement conditions from the permit.
Emission limits	We have decided that emission limits should be set for the parameters listed in the permit. These are described in the relevant BAT Conclusions in Section 5 of this document. It is considered that the ELVs/equivalent parameters or technical measures described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment is secured. We have included condition 2.3.9 and the associated IC10 in the permit that states that the ELVs are not applicable in the event that the site receives a Black Start Instruction from National Grid. IC10 requires the operator to submit a report which assesses the impact of any such operation under Black Start. We have amended the requirement in table S3.2 to monitor total chlorine in the surface water discharge to free chlorine in accordance with an agreement made with us in June 2019. The ELV remains unchanged.
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. These are described in the relevant BAT Conclusions in Section 5 of this document. Table S3.3 Process monitoring requirements was amended to include the requirement to monitor energy efficiency after overhauls on site in line with BAT2.
Reporting	We have specified reporting in the permit for the following parameters: • Nitrogen dioxide • Carbon monoxide

Aspect considered	Decision
	These are described in the relevant BAT Conclusions in Section 5 of this document.
Operator competence	
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.
Growth Duty	
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.