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: The Operator is: The Installation is: This Variation Notice number is: EPR/SP3938LQ/V004

EPR/SP3938LQ National Grid Gas Plc **Bishop Auckland Compressor Station**

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

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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 terms

- 1 Our decision
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- 2.1 Requesting information to demonstrate compliance with BAT Conclusions for Large Combustion Plant
- 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
- 3 The legal framework
- 4 Key Issues
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- 4.2 The energy efficiency levels associated with the Best Available Techniques Conclusions
- 5 Decision checklist regarding relevant BAT Conclusions
- 6 Review and assessment of derogation requests made by the operator in relation to BAT Conclusions which include an associated emission level (AEL) value
- 7 Emissions to Water
- 8 Additional IED Chapter II requirements
- 9 Review and assessment of changes that are not part of the BAT Conclusions derived permit review.

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.)

Air Pollution Control
Best Available Technique(s)
BAT Associated Energy Efficiency Level
BAT Associated Emission Level
BAT conclusion
Best available techniques reference document
Continuous emissions monitor
Combined heat and power
Calorific value
Directly associated activity – Additional activities necessary to be carried out to allow the principal activity to be carried out
Dry Low NOx burners
Dry Low NOx effective
European environment information and observation network is a partnership network of the European Environment Agency
Emission limit value derived under BAT or an emission limit value set out in IED
Environmental Management System
Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No. 1154)
European waste catalogue
Food Standards Agency
Improvement Condition
Industrial Emissions Directive (2010/75/EU)
Integrated Pollution Prevention and Control Directive (2008/1/EC) – now superseded by IED
Large Combustion Plant subject to Chapter III of IED
Minimum start up load/minimum shut-down load
Oxides of nitrogen (NO plus NO ₂ expressed as NO ₂)
Net Present Value
Open Cycle Gas Turbine
Public Health England
Special Area of Conservation
Sector guidance note
Technical guidance note
Total Organic Carbon
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 30/11/18.

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.

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)

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 if 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.

The LCPs on site consist of two OCGT gas turbine compression units, LCP 233 which has a thermal input of 67.1 MW (point A1) and LCP 234 which has a thermal input of 71.4 MW (point A2). The units burn natural gas only.

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

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

• Unlimited hours operation

The Operator submitted the operational performance emissions data for NOx and CO for each individual turbine as part of the original permit application in 2006. This excluded any data collected when the plant was operating at <55% Maximum Continuous Rating (MCR). These figures provided the realistic emission values that individual turbines could achieve at >55% MCR and were the basis on which emission limit values for Carbon Monoxide (CO) and

NOx were set. The Limits in the previous permit did not apply during start up, shut down or during operation at loads <55% of MCR.

On this site the plant is required by the gas grid to operate at low load for usually only short periods of time. In order to ensure that emissions between MSUL and 55% are monitored we have the option of either setting additional ELVs or recording the hours below 55% operation and retaining the note that the limits are excluded at operation <55%.

We have agreed to retain the current approach of recording hours of operation below 55% MCR. This is because the ELVs would have to be set very high which would not reflect environmental risk. This would further complicate an already complex system where more than one ELV is set. The environmental risk associated with this approach is low and we have decided to maintain monitoring using the number of operating hours in this mode as a proxy.

We have included a note in tables S3.1 and S3.1a for all Nation Grid Gas sites that states 'excluding start up, shut down and operation at loads <55% of MCR'. A requirement for the hours of operation below 55% to be recorded is included in Schedule 4 of the permit.

IED specified that limits apply over 70% load and the BAT Conclusions specify that AELs apply when dry low NOx is effective (DLN-E). For NGG permits 55% MCR is used as a proxy for DLN-E. We have used 55% MCR as a default across all monitoring requirements for NOx and CO.

The following tables outline the limits that have been incorporated into the permit for LCP 233 and LCP 234, 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 1) - Existing	BREF (Table 24 BAT- c)	Expected permit limits	Basis	Limits apply	Monitoring			
Annual	None	60 Note 1	60	BREF	>55% of MCR ^{Note 3}				
Monthly	75	None	65 Note 2	Note 2	>55% of MCR ^{Note 3}	Continuouo			
Daily	82	65 Note 1	65	BREF	>55% of MCR ^{Note 3}	Continuous			
95 th %ile of hr means	150	None	150	IED	>55% of MCR ^{Note 3}				

Note 1: As an existing OCGT Mechanical Drive plant put into operation no later than 7 January 2014, footnotes 14 and 15 to Table 24 of the BAT Conclusions apply, these footnote specify the applicable BAT-AELs.

Note 2: This limit is tighter than the IED annex V limit (75mg/m³) which was previously set in the permit. The monthly limit cannot be higher than the daily limit, therefore we have set a monthly limit which matches the daily limit given in the BAT Conclusions.

Note 3: The BAT Conclusions specify that AELs apply when dry low NOx is effective (DLN-E). For NGG permits, 55% MCR is used as a proxy for DLN-E.

CO limits (mg/Nm ³)										
Permit – Existing	IED (Annex V Part 1) - Existing	V BREF (after Expected Table 24 permit limits BAT-c) Basis		Basis	Limits apply	Monitoring				
None	None	40	40	BREF	>55% of MCR Note 1					
100	100	None	100	IED	>55% of MCR Note 1	Continuous				
100	110	None	100	Permit	>55% of MCR Note 1	Continuous				
100	200	None	100	Permit	>55% of MCR Note 1					
	Existing None 100 100	ExistingIED (Annex V Part 1) - ExistingNoneNone100100100110	Permit – ExistingIED (Annex V Part 1) - ExistingBREF (after Table 24 BAT-c)NoneNone40100100None100110None	Permit - ExistingIED (Annex V Part 1) - ExistingBREF (after Table 24 BAT-c)Expected permit limitsNoneNone4040100100None100100110None100	Permit ExistingIED (Annex V Part 1) - ExistingBREF (after Table 24 BAT-c)Expected permit limitsBasisNoneNone4040BREF100100None100IED100110None100Permit	Permit - ExistingIED (Annex V Part 1) - ExistingBREF (after Table 24 BAT-c)Expected permit limitsBasisLimits applyNoneNone4040BREF>55% of MCR Note 1100100None100IED>55% of MCR Note 1100110None100Permit>55% of MCR Note 1100200None100Permit>55% of MCR Note 1				

Note 1: The BAT Conclusions specify that AELs apply when dry low NOx is effective (DLN-E). For NGG permits, 55% MCR is used proxy for DLN-E.

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 evidence provided to demonstrate that the AEELs are met was specified in their regulation 61 response. The Operator confirmed that the original equipment manufacturer provided a calculation based on their internal product data for the equipment installed in order to determine the net mechanical efficiency. 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 electricalNet total fuelNet mechanicaefficiencyutilisationefficiency							
LCP233	LCP233 and LCP234: Open cycle gas turbine, ≥ 50 MWth, Existing unit, Mechanical Drive									
None	None	33.5 – 41	NA	NA	39.1					

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	S1.2, S1.4, S1.5, S3.1a
Energy efficiency	1.2 and 2.3	S3.3
Noise	3.4 and 2.3	S2.1
Other operating techniques	2.3	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. Numbe r	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; 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; viix. application of sectoral benchmarking on a regular basis. Etc - see BAT Conclusions	CC	The operator has confirmed that a site specific Environment Management System is in place certified to ISO14001.

BAT Concn. Numbe r	Summary of BAT Conclusion red	quirement		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	
	Applicability. The scope (e.g. leve will generally be related to the natu impacts it may have.	el of detail) and nature of the EMS (e.g. s re, scale and complexity of the installation	tandardised or non-standardised) on, and the range of environmental			
2	energy efficiency of the gasification load (1), according to EN standard significantly affect the net electrical energy efficiency of the unit. If EN	cal efficiency and/or the net total fuel utilis h, IGCC and/or combustion units by carry s, after the commissioning of the unit and l efficiency and/or the net total fuel utilisa standards are not available, BAT is to us the provision of data of an equivalent sc	ring out a performance test at full after each modification that could tion and/or the net mechanical e ISO, national or other	CC	The operator has explained that equipment is not fitted to allow for the determination of the net mechanical efficiency of the plant. The original equipment manufacturer has calculated the mechanical efficiency based upon internal product data. The net mechanical efficiency of the unit LCP233 and LCP234 is 39.1%. A process monitoring requirement has been set in table S3.3 which requires energy efficiency monitoring after an overhaul.	
3	BAT is to monitor key process p given below.	arameters relevant for emissions to ai	ir and water including those	CC	Flow – Fuel gas usage is measured and flue-gas flow is	
	Stream	Parameter(s)	Monitoring		determined by stoichiometric	
	Flue-gas	Flow	Periodic or continuous determination		calculations.	
		Oxygen content, temperature, and pressure	Periodic or continuous measurement		Oxygen content, temperature and	
		Water vapour content (3)			pressure – NOx, CO and O ₂	
	Waste water from flue-gas treatment	Flow, pH, and temperature	Continuous measurement		concentration content is measured via periodic measurements, conducted by UKAS ISO17025 laboratory to EN standards. Emissions measurements taken in	

BAT Concn. Numbe r	Summary of I	BAT Conclusion requiremen	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				
								this way are not affected by changes in temperature and pressure and these parameters are not required for correction to reference conditions. We are satisfied with the Operators justification of why temperature and pressure are not measured. Water vapour content - Flue gas is dried prior to measurement for periodic monitoring. Waste water from flue-gas treatment - no waste water is generated from flue-gas treatment.
4	If EN standard	itor emissions to air with at lea Is are not available, BAT is to ata of an equivalent scientific q	use ISO, nati					The operator has confirmed that NO _x and CO are monitored on a continuous basis. Foot note 5
	Substance/P arameter	Fuel/Process/Type of combustion plant	Combustion plant total rated thermal input	Standard(s) <u>(</u> ⁴)	Minimum monitoring frequency <u>(</u> ⁵)	Monitoring associated with		applies which allows for the use of a Predictive Emissions Monitoring System (PEMS). This is in place at the installation.
	NH ₃	 When SCR and/or SNCR is used 	All sizes	Generic EN standards	Continuous <u>(⁶)(</u> ⁷)	BAT 7		
	NOx	 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 	All sizes	Generic EN standards	Continuous <u>(⁶)(⁸)</u>	BAT 20 BAT 24 BAT 28 BAT 32 BAT 37 BAT 41 BAT 42 BAT 43 BAT 47		

BAT Concn. Numbe r	Summary o	f BAT Conclusion requiremer	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				
		 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 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 ₂ O	 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		
	СО	- 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 - Iron and steel process gases - Process fuels from the chemical industry - IGCC plants	All sizes	Generic EN standards	Continuous <u>(⁶)(⁸)</u>	BAT 20 BAT 24 BAT 28 BAT 33 BAT 38 BAT 44 BAT 49 BAT 56 BAT 65 BAT 65 BAT 73		
		 Combustion plants on offshore platforms 	All sizes	EN 15058	Once every year <u>(⁹)</u>	BAT 54		

BAT Concn. Numbe r	Summary of I	BAT Co	onclusion requiremen	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				
	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 <u>(°)('1)</u> ('2)	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 <u>(15)(16)</u>	BAT 25		
		_	Waste co-incineration	All sizes	Generic EN standards	Continuous <u>(⁶)(¹⁶)</u>	BAT 66 BAT 67		
	HF	_	Coal and/or lignite Process fuels from the chemical industry in boilers	All sizes	No EN standard available	Once every three months_(6)_(¹³)(¹⁴)	BAT 21 BAT 57		
		-	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 <u>(⁶)(¹⁶)</u>	BAT 66 BAT 67		
	Dust	_	Coal and/or lignite	All sizes	Generic EN standards and	Continuous <u>(⁶)(¹⁷)</u>	BAT 22 BAT 26		

BAT Concn. Numbe r	Summary of B	BAT Conclusion requiremen	ıt			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 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 		EN 13284-1 and EN 13284-2		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,	 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 <u>(18)</u>	BAT 22 BAT 26 BAT 30		
	Zn)	Waste co-incineration	< 300 MW _{th} ≥ 300 MW _{th}	EN 14385 EN 14385	Once every six months_(13) Once every three months_(19)_(13)	BAT 68 BAT 69		
		— IGCC plants	≥ 100 MW _{th}	EN 14385	Once every year (18)	BAT 75		
	Hg	Coal and/or lignite including waste co-	< 300 MW _{th}	EN 13211	Once every three months $(1^3)(2^0)$	BAT 23		
		incineration	≥ 300 MW _{th}	Generic EN standards and EN 14884	Continuous <u>(16)(21)</u>			
		 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 (1^3)	BAT 70		
		 IGCC plants 	≥ 100 MW _{th}	EN 13211	Once every year (23)	BAT 75		

BAT Concn. Numbe r	Summary of BAT Conclusion requirement										Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	TVOC	 HFO- and/or engines Process fuel chemical inc boilers 		All sizes EN 1261		N 12619 Once even months_1 ¹³		:	BAT 33 BAT 59		
			Naste co-incineration with coal, lignite, solid biomass All sizes Generic standa		Generic standarc		Continuous		BAT 71		
	Formaldehyde	Natural-gas ignited lean- dual fuel eng	burn gas and	All sizes	All sizes No EN s available		Once every yes	ar	BAT 45		
	CH ₄	- Natural-gas-	fired engines	All sizes	EN ISO 25139		Once every yes	ar <u> (</u> ²⁴ <u>)</u>	BAT 45		
	PCDD/F	 Process fuel chemical inc boilers Waste co-inc 	lustry in	All sizes	EN 1948 EN 1948 EN 1948	3-2,	Once every six months (13) (25)				
5	accordance international	with EN standard	s. If EN sta sure the prov	andards are not available, BAT i vision of data of an equivalent scie Standard(s) Minin			imum Monitoring itoring associated with			NA	The plant does not have flue-gas treatment installed.
	Total organia	arbon (TOC) (26)	EN 1484				quency	BAT 15	-		
	Total organic carbon $(TOC)_{1}^{26}$ Chemical oxygen demand $(COD)_{1}^{26}$		-	dard available		Once eve	ery month	BAT 15			
		ded solids (TSS)	EN 872								
	Fluoride (F ⁻)		EN ISO 103	304-1							
	Sulphate (SO		EN ISO 103	304-1							
	Sulphide, eas	Sulphide, easily released (S ^{2–}) No EN star		dard available							
	Sulphite (SO ₃	,	EN ISO 103	04-3	04-3						
	Metals and m	Metals and metalloids As									

BAT Concn. Numbe r	Sun	nmary of BAT Co	nclusion	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			
			Cd Cr Cu Ni Pb Zn Hg	Various EN standards available (e EN ISO 11885 or EN ISO 17294-2 Various EN standards available (e	2)			
		iloride (Cl⁻) tal nitrogen	EN ISO 12846 or EN ISO 17852) Various EN standards available (e EN ISO 10304-1 or EN ISO 15682 EN 12260			_		
6	air	of CO and unbunder of the te	Irnt substa	•	nised combustion and to	use an appropriate	CC	The operator has confirmed that the following measures are in place:
	a.	Technique Fuel blending and mixing	reduce the	Description able combustion conditions and/or e emission of pollutants by mixing ualities of the same fuel type	Applicabili Generally applicable	ty		b. Maintenance of the combustion system – A preventative maintenance management system
	b.							is in place which is certified to both PAS55 and ISO 55001. The maintenance system identifies all site plant and equipment
	C.	Advanced control system	See desci	ription in Section 8.1	The applicability to old combu constrained by the need to re system and/or control comma	trofit the combustion		site plant and equipment, frequency of maintenance, requirements for maintenance as set by the manufacturer, British and international standards used and details of any incidents and failures.
	d.	Good design of the combustion equipment	chambers	ign of furnace, combustion , burners and associated devices	Generally applicable to new o	combustion plants		
	e. Fuel choice 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,				Applicable within the constrait the availability of suitable type environmental profile as a wh impacted by the energy policy	es of fuel with a better nole, which may be		c. Advanced Control Systems – A control system is in place which controls parameters on the combustion units and ensures

BAT Concn. Numbe r	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	
	including in start-up situations or when back- up fuels are used 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		emissions are within the required limits. d. Good design of the combustion equipment – The existing plant is able to achieve the emission limits required through the BAT conclusions document.	
7	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 .	NA	The operator has confirmed that neither SCR or SNCR are not installed at this installation.	
8	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.	NA	The operator has confirmed that no abatement equipment is installed at this installation.	
9	 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); 	CC	Natural Gas is the only fuel burnt in the LCPs. This is provided by the National Gas Transmission System. As such it is provided to the site at the UK standard for Natural Gas. This gas has to meet a nationally agreed specification for all the parameters listed. We consider	

BAT Concn. Numbe r	Summary of BAT Conclusion req	Summary of BAT Conclusion requirement							
	characterisation and control in t Description Initial characterisation and regular t	plant settings as and when needed and practicable (e.g. integration of the fuel he advanced control system (see description in Section 8.1)). resting of the fuel can be performed by the operator and/or the fuel supplier. I results are provided to the operator in the form of a product (fuel) supplier		that for plants which burn natural gas from the National Grid as a fuel that it is not necessary for the operator to replicate the testing carried out by the National Grid					
	Fuel(s)	Substances/Parameters subject to characterisation							
	Biomass/peat	— LHV							
		— moisture							
		— Ash							
		— C, Cl, F, N, S, K, Na							
		 Metals and metalloids (As, Cd, Cr, Cu, Hg, Pb, Zn) 							
	Coal/lignite	LHV							
		— Moisture							
		 Volatiles, ash, fixed carbon, C, H, N, O, S 							
		— Br, Cl, F							
		— Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn)							
	HFO	— Ash							
		— C, S, N, Ni, V							
	Gas oil	_ Ash							
		— N, C, S							
	Natural gas	— LHV							
		— CH ₄ , C ₂ H ₆ , C ₃ , C ₄ +, CO ₂ , N ₂ , Wobbe index							
	Process fuels from the chemical	— Br, C, Cl, F, H, N, O, S							
	industry <u>(²⁷)</u>	— Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn)							

BAT Concn. Numbe r	Summary of BAT Conclu	usion 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 gase	S LHV, CH ₄ (for COG), C _X H _Y (Wobbe index	(for COG), CO ₂ , H ₂ , N ₂ , total sulphur, dust,		
	Waste <u>(²⁸)</u>	— LHV			
		— Moisture			
		— Volatiles, ash, Br, C, Cl, F,	H, N, O, S		
		— Metals and metalloids (As, Co	d, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn)		
10	 is to set up and implement commensurate with the reference of the matrix and/or soil (e.g., generation in gas turbing) generation in gas turbing set-up and implementation of the matrix and recording of actions if necessary, periodic assessment 	ons to air and/or to water during other than no t a management plan as part of the environi- elevance of potential pollutant releases, that he systems considered relevant in causing OTNO- low-load design concepts for reducing the mini- nes), attion of a specific preventive maintenance plan for of emissions caused by OTNOC and associated ci- of the overall emissions during OTNOC (e.g on) and implementation of corrective actions if neo-	mental management system (see BAT 1), includes the following elements: C that may have an impact on emissions to air, imum start-up and shutdown loads for stable these relevant systems, rcumstances and implementation of corrective for frequency of events, duration, emissions	СС	The operator has confirmed that no abatement equipment is installed at this installation.
11	Description The monitoring can be car if this proves to be of equ during start-up and shutdo for a typical SU/SD proce	onitor emissions to air and/or to water during rried out by direct measurement of emissions ual or better scientific quality than the direct own (SU/SD) may be assessed based on a d dure at least once every year, and using the d every SU/SD throughout the year.	СС	Procedures are detailed in the Environment Management System for OTNOC. The plant monitors critical gas turbine running parameters and are shut down in the event of a malfunction or OTNOC.	
12		nergy efficiency of combustion, gasification ate combination of the techniques given belo		CC	The operator has confirmed the following measures are in place:
	Technique	Description	Applicability		a Combustion antimization Day
	optimisation C	See description in Section 8.2. Optimising the combustion minimises the content of unburnt substances in the flue-gases and in solid combustion residues			a. Combustion optimisation – Dry Low Emission (DLE) lean burn pre-mixed combustion system ensures that fuel and air are pre-

BAT Concn. Numbe r	Sur	nmary of BAT Cond	clusion 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
	b.	Optimisation of the working medium conditions	Operate at the highest possible pressure and temperature of the working medium gas or steam, within the constraints associated with, for example, the control of NO _x emissions or the characteristics of energy demanded			mixed prior to combustion. This provided a more homogenous reaction (flame) temperature below the temperature at which thermal NO _x production rates are
	с.	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			 b. Working medium optimisation – the compression units are
	d.	Minimisation of energy consumption	Minimising the internal energy consumption (e.g. greater efficiency of the feed-water pump)			operated at optimum efficiency within the constraints of the
	e.	combustion air combustion flue-gas to preheat the air used in combustion		Generally applicable within the constraints related to the need to control NO_X emissions		system and the supply/demand patterns of gas delivery.
	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		 d. Minimisation of energy consumption – The compression units are sized an optimised for the duty required. e. Pre-heating of combustion air – This is not applicable during
	g. h.	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		
		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		normal operations. Preheating is only used where anti-icing techniques are employed at low temperatures. f. Fuel pre-heating – This is
	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:	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		undertaken by an electric heat exchanger and then oil to gas heat exchanger.
			 flue-gas grate cooling circulating fluidised bed 			g. Advanced control system – The DLE system is government by the overall automatic combustion control system.

BAT Concn. Numbe r	Sur	nmary of BAT Cond	clusion 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		
	I.	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		
	0.	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		
	r.	Steam turbine upgrades	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	The applicability may be restricted by demand, steam conditions and/or limited plant lifetime		

BAT Concn. Numbe r	Su	mmary 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	
	S.	Supercritical ar ultra-supercritic steam conditior	sal 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	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		
13			water usage and the volume of contaminated waste	NA	The operator has confirmed that the process of gas turbine driven	
	Technique		Description	Applicability		mechanical drive gas
	a.	Water recycling	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	Not applicable to waste water from cooling systems when water treatment chemicals and/or high concentrations of salts from seawater are present		compression does not use water. There are thus no process waters generated from the plant that can be recycled.
	b.	Dry bottom ash handling	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.	Only applicable to plants combusting solid fuels. There may be technical restrictions that prevent retrofitting to existing combustion plants		
14	to s		the contamination of uncontaminated waste water a water streams and to treat them separately, depen		CC	The operator has confirmed the following:
	Wa wa: Ap	ste water strear ste water from fl plicability	ns that are typically segregated and treated include lue-gas treatment. ay be restricted in the case of existing plants due to t		Although no water based effluent is generated from the process, around 20-50 litres of water with detergent is used to complete a 'wash' of the gas turbine, to clean out combustion and airborne debris within the inside the inside of the engine. All of the water used to complete washing is	

BAT Concn. Numbe r	Summary of BAT Conclusion requ	irement		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			
					contaminated. It is collected, segregated and disposed of as hazardous waste. There are no discharges to sewer from the installation. Domestic discharges from the facilities in the control building are directed to a domestic effluent holding tank. The contents of the tank are pumped out, by a third-party contractor, on a regular basis. No process effluent is discharged from emission point W1. All surface water passes through the installation's main interceptor to remove any residual oil collected from site run-off, prior to being discharged to W1. A programme of visual inspection of the discharge, for oil and grease, is in place to ensure efficiency of the oil interceptor.			
15		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						
	Technique							
	a. Optimised combustion (see BAT 6) and flue-gas treatment systems (e.g. SCR/SNCR, see BAT 7)	Organic compounds, ammonia (NH ₃)	Generally applicable					

BAT Concn. Numbe r	Sur	nmary of BAT Conclusion req	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		
			Secondary technique	s <u>(²⁹)</u>		
	b.	Adsorption on activated carbon	Organic compounds, mercui (Hg)	ry Generally applicable		
	c. Aerobic biological treatment Biodegradable organic compounds, ammonium (N		Biodegradable organic compounds, ammonium (NH	$ \begin{array}{c} 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) $		
	d.	Anoxic/anaerobic biological treatment	Mercury (Hg), nitrate (NO ₃ ⁻) nitrite (NO ₂ ⁻)), Generally applicable		
	e. Coagulation and flocculation Suspended solids		Suspended solids	Generally applicable		
	f.	Crystallisation	Metals and metalloids, sulph (SO ₄ ^{2–}), fluoride (F [–])	nate Generally applicable		
	g. Filtration (e.g. sand filtration, microfiltration, ultrafiltration) Suspended solids, metals		Suspended solids, metals	Generally applicable		
	h.	Flotation	Suspended solids, free oil	Generally applicable		
	i.	lon exchange	Metals	Generally applicable		
	j.	Neutralisation	Acids, alkalis	Generally applicable		
	k.	Oxidation	Sulphide (S ²⁻), sulphite (SO ₃	²⁻) Generally applicable		
	١.	Precipitation	Metals and metalloids, sulph (SO ₄ ^{2–}), fluoride (F [–])	nate Generally applicable		
	m.	Sedimentation	Suspended solids	Generally applicable		
	n.	Stripping	Ammonia (NH ₃)	Generally applicable		
		allation. BAT-AELs for direct d	scharges to a receiving w	body at the point where the emission leaves the vater body from flue-gas treatment		
		Substance/Parar	neter	BAT-AELs		
				Daily average		
		tal organic carbon (TOC)		20–50 mg/l (1^{30}) (1^{31}) (1^{32})		
		emical oxygen demand (COD)		60-150 mg/l(30) (31) (32)		
		tal suspended solids (TSS)		10–30 mg/l		
	Flu	loride (F [_])		10–25 mg/l_(³²)		

BAT Concn. Numbe r	Su	mmary of BAT Con	clusion 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			
	Su	Ilphate (SO4 2-)						
	Sulphate (SO ₄ ²⁻) 1,3–2, Sulphide (S ²⁻), easily released 0,1–0,					g/l_(³²)		
	Su	Ilphite (SO ₃ ^{2–})			1–20 mg/l	<u>(³²)</u>		
	M	etals and metalloids		As	10–50 µg/	1		
	C				2–5 µg/l			
				Cr	10–50 µg/			
				Cu	10–50 µg/			
	Hg				0,2–3 µg/l			
				Ni	10–50 µg/			
				Pb	10–20 μg/ 50–200 μg			
	Zn Zn					g/l		
16	aba acc (a (b (c	atement techniques, count life-cycle thinki) waste prevention,) waste preparatior) waste recycling	BAT is to organise operations: e.g. maximise the proportion of for reuse, e.g. according to g;	ons so as n of residu the speci	to maxim	••	NA	There is no waste generated from combustion process and no abatement systems in operation at the installation.
	(d	/	covery (e.g. energy recovery)					
	by	¥ / /	propriate combination of tech		ich as:	Applieghility		
	Technique Description a. Generation of gypsum as a by- product Quality optimisation of the calcium-based residues generated by the wet FGD so th be used as a substitute for mined gypsum raw material in the plasterboard industry). quality of limestone used in the wet FGD the purity of the gypsum produced					t they can associated with the required gypsum (e.g. as quality, the health requirements The associated to each specific use, and by		
	b.	Recycling or recovery of residues in the construction sector	Recycling or recovery of residu dry desulphurisation processes as a construction material (e.g. replace sand in concrete produ cement industry)	s, fly ash, b . in road bu	oottom ash) uilding, to	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		

BAT Concn. Numbe r	Su	mmary of BAT Conc	lusion 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	
	C.	Energy recovery by using waste in the fuel mix	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	Generally applicable where plants can accept waste in the fuel mix and are technically able to feed the fuels into the combustion chamber		
	d.	catalyst for reuse	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	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		
17	In c	order to reduce noise	emissions, BAT is to use one or a combination of	СС	The operator has confirmed the	
		Technique	Description	Applicability		following:
	a.	 a. Operational measures 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 		Generally applicable		 a. Operational measures – The equipment is operated by experienced staff. Preventative maintenance regime is in place. b. Low noise equipment and d. Noise control equipment – The following plant has noise control equipment in place. -Gas turbine intake and exhaust
	b.	Low-noise equipment	This potentially includes compressors, pumps and disks	Generally applicable when the equipment is new or replaced		systems – situated in an acoustically insulated building. -Compressors – situated in an
	C.	Noise attenuation	Noise propagation can be reduced by inserting obstacles between the emitter and the receiver. Appropriate obstacles include protection walls, embankments and buildings	Generally applicable to new plants. In the case of existing plants, the insertion of obstacles may be restricted by lack of space		acoustically insulated building. -Compressor suction and discharge pipework – the pipework is burred with acoustic
	d.	d. Noise-control equipment This includes: — noise-reducers — equipment insulation — enclosure of noisy equipment		The applicability may be restricted by lack of space		lagging fitted. -Recycle valves/pipework – located in pits which helps to minimise the noise. -Fuel gas skids – pipework

BAT Concn. Numbe r	Su	mmary of BA	AT Concl	usion requ	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				
				— soun	dproofing of bui	ldings				-Depressurisation valves and vents – the valves are acoustically
	e.	Appropriate lo of equipment buildings		distance bet		d by increasing the er and the receiver and screens	Generally applicab	le to new plant		boxed in or buried.e. Appropriate location – Any new
										equipment will be assessed in order to identify suitable layout that will minimise noise.
Combus	tion	of gaseous f	uels							
40	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.									BAT 12: a, b, d, f, g, p and q.
		echnique	Ŭ	ription		Applic	ability			Combined cycle is not applicable to mechanical drive gas turbines
	a.	Combined cycle	See des Section	cription in 8.2	< 1 500 h/yr Applicable to associated v Not applicab	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				operated in discontinuous mode with extended load variations and frequent start-ups and shutdowns The operator has explained that
					with extende	with extended load variations and frequent start-ups and shutdowns. Not applicable to boilers				equipment is not fitted to allow for the determination of the net
				efficiency	levels (BAT-	AEELs) for the combu		gas		mechanical efficiency of the plant.
		Type of combu unit	ustion	Nata	1-1 1	BAT-AEELs (136)				The original equipment
					ectrical ncy (%)	Net total fuel utilisation (%) (¹³⁸) (¹³⁹)		anical energy y (%) <u>(¹³⁹) (¹⁴⁰)</u>		manufacturer has calculated the
				New unit	Existing unit		New unit	Existing unit		mechanical efficiency based upon internal product data.
	Gas engine		39,5– 44 <u>(¹⁴¹)</u>	35–44 <u>(¹⁴¹)</u>	56–85 <u>(¹⁴¹)</u>	No BAT-AEEL			The net mechanical efficiency of the unit LCP233 and LCP234 is	
	G	as-fired boiler	as-fired boiler		38–40	78–95	No BAT-AEEL	•		39.1%.
		pen cycle gas tu) MWth	urbine, ≥	36–41,5	33–41,5	No BAT-AEEL	36,5–41	33,5–41		This plant is and existing unit and
				C	ombined cyc	le gas turbine (CCGT)		· · · · · · · · · · · · · · · · · · ·		falls within the category 'open cycle gas turbine, ≥ 50MWth'. The

BAT Concn. Numbe r	Su	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			
	C	CGT, 50–600 MW _{th}	53–58,5	46–54	No BAT-AEEL	No BAT-AEELNo BAT-AEELNo BAT-AEELNo BAT-AEEL			expected range is 33.5 – 41%.
	CO	CGT, ≥ 600 MW _{th}	57–60,5	50–60	No BAT-AEEL				The net mechanical efficiency of this plan 39.1% falls within this
	CI	HP CCGT, 50–600 MW _{tt}	53–58,5	46–54	65–95		No BAT-AEEL		range.
	CI	HP CCGT, ≥ 600 MW _{th}	57–60,5	57–60,5 50–60 65–95			No BAT-AEEL		
41		order to prevent or re e or a combination of				ustion of n	atural gas in boilers, BAT is to us	e NA	The plant is a gas compression unit. It is not a gas boiler and so
		Technique	·	Description Applicability		1	this BAT conclusion is not applicable.		
	a.	Air and/or fuel staging	g See descriptions in Section 8.3. Air staging is often associated with low-NO _X burners		Generally applicable				
	b.	Flue-gas recirculation	See descrip	tion in Section 8	3.3				
	C.	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.			Generally applicable within the constraints associated with the process needs					
	f.	Selective non- catalytic reduction (SNCR)			< 500 h/yr v The applica combustion	able to combustion plants operated with highly variable boiler loads. ability may be limited in the case of n plants operated between 500 h/yr h/yr with highly variable boiler loads			
	g.	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					

BAT Concn. Numbe r	Su	Summary of BAT Conclusion requirement				Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
42			r reduce NO _X emissions to air from the combustion of the techniques given below.	n of natural gas in gas turbines, BAT is to	СС	The operator has confirmed in their regulation 61 notice that they
		Technique	Description Applicability			are Compliant with the BAT AELs
	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		for NOx through combustion system design and control.
	b.	Water/steam addition	See description in Section 8.3	The applicability may be limited due to water availability		
	C.	Dry low-NO _X burners (DLN)		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		
	d.	Low-load design concept	Adaptation of the process control and related equipment to maintain good combustion efficiency when the dema in energy varies, e.g. by improving the inlet airflow cont capability or by splitting the combustion process into decoupled combustion stages	nd gas turbine design		
	e.	Low-NO _x burners (LNB)	See description in Section 8.3	Generally applicable to supplementary firing for heat recovery steam generators (HRSGs) in the case of combined-cycle gas turbine (CCGT) combustion plants		
	f.	Selective catalytic reduction (SCR)		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 plants operated between 500 h/yr and 1 500 h/yr		
43			r reduce NO _x emissions to air from the combustio n of the techniques given below.	n of natural gas in engines, BAT is to use	NA	The plant is a gas compression unit. It is not a gas engine and so
		Technique	Description			

BAT Concn. Numbe r	Su	mmary of BAT (Conclusion requiremen	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			
	a. Advanced control system See description in Section 8.3. This technique is often used in combinatio with other techniques or may be used alor combustion plants operated < 500 h/yr			ed in combination hay be used alone for		ombustion plants may be to retrofit the combustion mmand system		this BAT conclusion is not applicable.
	b.	Lean-burn concept	See description in Section Generally used in combina		Only applicable to new g	as-fired engines		
	C.	Advanced lean- burn concept	See descriptions in Sectio	n 8.3	Only applicable to new s	park plug ignited engines		
	d.				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			
44	cor De	nbustion and/or t scription - See c	or reduce CO emissions t to use oxidation catalysts descriptions in Section emission levels (BAT-A	СС	The operator has confirmed that they will be able to meet the compliance limits for NO _x and CO. Where the existing permit sets			
		Type of con	nbustion plant	Combustion plant				monthly, daily and hourly average
l				total rated thermal input (MW _{th})	Yearly average <u>(¹⁴⁴)</u> (¹⁴⁵)	Daily average or average over the sampling period		emission limits for CO and NOx. Under the principal of "no backsliding", the current emission
			Open-cycl	e gas turbines (OCG	Гs <u>) (¹⁴⁶) (¹⁴⁷)</u>	·		limits will be retained unless tighter limits are set by the BREF.
	Ne	w OCGT		≥ 50	15–35	25–50		
	me	isting OCGT (exclu echanical drive app erated < 500 h/yr	uding turbines for lications) — All but plants	≥ 50	15–50	25–55 <u>(¹⁴⁸)</u>		Limits for CO and NOx are applicable above 55% MCR. See the key issues section for further
			Combined-c	ycle gas turbines (CC	GTs <u>) (¹⁴⁶) (¹⁴⁹)</u>			information.
	Ne	ew CCGT		≥ 50 10–30		15–40		
	Existing CCGT with a net total fuel utilisation of < 75 %			≥ 600	10–40	18–50		

BAT Concn. Numbe r	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			
	Existing CCGT with a net total fuel utilisation of \geq 75 %	≥ 600 10–50		18–55 <u>(¹⁵⁰)</u>		
	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 \geq 75 %	50–600	25–50 <u>(¹⁵¹)</u>	35–55 <u>(¹⁵²)</u>		
	Open- a	nd 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 <u>(153)</u> (154)		
	Existing gas turbine for mechanical drive applications — All but plants operated < 500 h/yr					
	 ≥ 1 500 h/yr and for each type of new comb New OCGT of ≥ 50 MW_{th}: < 5–40 mg/Nm³. F factor may be applied to the higher end of this energy efficiency or net mechanical energy Existing OCGT of ≥ 50 MW_{th} (excluding turk this range will generally be 80 mg/Nm³ in th reduction, or 50 mg/Nm³ for plants that oper 	al				
	 New CCGT of ≥ 50 MW_{th}: < 5–30 mg/Nm³. F factor may be applied to the higher end of the energy efficiency of the plant determined at 					
	 Existing CCGT of ≥ 50 MW_{th}: < 5–30 mg/Nr operate at low load. 	at				
	 Existing gas turbines of ≥ 50 MW_{th} for mech generally be 50 mg/Nm³ when plants operation 	II				
	In the case of a gas turbine equipped with operation is effective. BAT-associated emission levels (BAT-A					

BAT Concn. Numbe r	Summary of BAT Conclusion requirement							Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	Type of combustion	Yearl	y average <u> (¹⁵⁷)</u>	Daily average	Daily average or average over the sampling period			
	plant	New plant	Existing plant <u>(¹⁵⁸)</u>	New plant	Existir	ng plant <u> (¹⁵⁹)</u>		
	Boiler	10–60	50–100	30–85	85–110			
	Engine (160)	20–75	20–100	55–85	55–110 <u>(161)</u>			
	< 5–15 mg/Nm 30–100 mg/Nm ³ for							
45	the combustion of natura and/or to use oxidation ca <i>Description</i> See descriptions in Sect hydrocarbons containing BAT-associated emi	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 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 CH₄ emissions to air from the combustion of natural gas in a spark-ignited lean-burn gas engine						The plant is a gas compression unit. It is not a spark-ignited lean- burn gas engine and so this BAT conclusion is not applicable.
	Combustion plant total r			BAT-AELs (mg/Nm ³)				
					Formaldehyde CH ₄			
					the sampling p	eriod		
			Ne	w or existing plant	New plant	Existing plant		
	≥ 50		5–1	5 <u>(162)</u>	215–500 (¹⁶³)	215–560 (162) (163)		

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 discharge to controlled waters identified as W1 (discharge to a unnamed brook).

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.

8 Additional IED Chapter II requirements:

There are no additional IED Chapter II requirements addressed through the permit review.

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 site(s)/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 site(s)/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.					
Changes to the permit conditions due to an	We have varied the permit as stated in the variation notice.					

Aspect considered	Decision
Environment Agency initiated variation	
Use of conditions other than those from the template	We have retained condition 2.3.4 relating to the annual Network Review. This is a condition of the permits for all National Grid Gas compressor stations.
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.
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.
	Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.
Reporting	We have specified reporting in the permit for the following parameters:
	Nitrogen dioxideCarbon monoxide
	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.

Aspect considered	Decision
	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.