

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/EP3333RW The Operator is: Uniper UK Limited

The Installation is: Taylor's Lane Power Station

This Variation Notice number is: EPR/EP3333RW/V004

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.

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

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- 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
- The legal framework
- 4 Key Issues
- 5 Decision checklist regarding relevant BAT Conclusions
- 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.)

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 NO₂ expressed as NO₂)

NPV Net Present Value

OCGT Open Cycle Gas Turbine
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 31 October 2018.

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)
- The review and assessment of the availability of BAT for gas turbines operating <500 hours per year

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 LCP(s) on site consist of:

LCP 390: a 280MWth OCGT, a GT pair that vent via flues within a single windshield at emission point A1. The units burn gas oil as a fuel. The GT pair can also fire in half-load or partial load modes

LCP 391: a 280MWth OCGT, a GT pair that vent via flues within a single windshield at emission point A2. The units burn gas oil as a fuel. The GT pair can also fire in half-load or partial load modes.

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 plant.

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

<500 hours non-emergency plant

The following tables outline the limits that have been incorporated into the permit for LCP390 and LCP391, 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% oxygen concentration if flue gases. The emission limits and monitoring requirements have been incorporated into Schedule 3 of the permit.

Under Chapter III gas turbines and gas engines operating for less than 500 hours per year are considered to be emergency plant and therefore were not covered by the emission limits set out in IED Annex V. However, for the purposes of the LCP BAT review, plants operated for emergency use may only be defined as plants which operate for the sole purpose of providing power at a site during an onsite emergency and/or during a black start and which do not provide balancing services or demand side response services. As this site runs commercially on an intermittent basis to support the Grid, it is not considered emergency plant and therefore indicative BAT applies.

We have set the indicative limits requiring validation through emission factors based on the principle that we will not require plant to fire up with the sole purpose of performing an emission measurement, as set out the UK Regulators Interpretation Document.

	NOx limits (mg/Nm³)											
Averaging	IED (Annex V Part 1) - Existing	BREF	Expected permit limits	Basis	Monitoring							
Annual	None	None	None	N/A								
Monthly	None	None	None	N/A								
Daily	None	Note 1	250 Note 2	Reported emissions Notes 1, 2	Concentration by calculation, every 2 years Note 3							
95 th %ile of hr means	None	None	None	N/A								

Note 1: BATc 38 provides an indicative emission level of 250 mg/Nm³ for combustion of gas oil in dual fuel gas turbines operating less than 500 hours per year. However this indicative figure is not strictly applicable to LCP 390 and LCP 391, because the gas turbines are not dual fuel.

Note 2: We have set a benchmark emission level at 250 mg/Nm³ based on the emissions reported by the Operator.

Note 3: Footnote 2 to BAT conclusion 4 specifies that the monitoring frequency does not apply where plant operation would be for the sole purpose of performing an emission measurement.

	SO ₂ limits (mg/Nm³) – indicative in <i>italics</i>										
Averaging	Part 1) - Existing BREF Expected permit limits Basis				Monitoring						
Annual	None	None	None	N/A							
Monthly	None	None	None	N/A	Composition by						
Daily	Daily None		66	BREF	Concentration by calculation, every 2 years Notes 1, 2						
95 th %ile of hr means	None	None	None	N/A							

Note 1: Footnote 2 to BAT conclusion 4 specifies that the monitoring frequency does not apply where plant operation would be for the sole purpose of performing an emission measurement.

Note 2: Footnote 8 to BAT conclusion 4 specifies that, as an alternative to the continuous measurement, in the case of plants combusting oil with a known sulphur content and where there is no flue- gas desulphurisation system, periodic measurements at least once every three months and/or other procedures ensuring the provision of data of an equivalent scientific quality may be used to determine the SO₂ emissions.

	Dust limits (mg/Nm³) – indicative in <i>italics</i>										
Averaging	Part 1) - Existing BREF Expected permit limits Basis		Basis	Monitoring							
Annual	None	None	None	N/A							
Monthly	None	None	None	N/A							
Daily average or average over the sampling period	None	10	10	BREF	Concentration by calculation, every 2 years Note 1						
95 th %ile of hr means	None	None	None	N/A							

Note 1: Footnote 2 to BAT conclusion 4 specifies that the monitoring frequency does not apply where plant operation would be for the sole purpose of performing an emission measurement.

We have specified in the revised permit monitoring and reporting requirements for LCP390 and LCP391 based on calculation of emissions according to the agreed protocol established in JEP Report JEP17EMG02/UTG/18/ERG/CT/773/R 'Maintaining the Emissions Performance of Open Cycle Gas Turbines that operate for less than 500 hours per year', October 2018. This is because we consider footnote 2 to BAT conclusion 4 to be relevant, this footnote specifies that the monitoring frequency does not apply where plant operation would be for the sole purpose of performing an emission measurement.

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.

Table 21 of the BAT Conclusions specifies that the AEELs for this type of plant are not applicable to plant operating less than 1500 hours per year. We have therefore not assessed this operational aspect of the plant for LPC 390 and LCP 391. We have however included a process monitoring requirement in table S3.3 of the consolidated variation notice. This is required to demonstrate that efficiency levels are maintained following any significant overhauls of equipment in order to fulfil the requirement of BAT Conclusion 2. For <500 hour plant we have specified that the assessment of efficiency can be based on calculation. This is because we will not require plant to fire up with the sole purpose of carrying out an assessment of efficiency.

4.3 The review and assessment of BAT for gas turbines operating < 500 hours per year

Joint Environmental Programme (JEP) produced a document 'BAT Assessment for Existing Gas and Liquid Fuel Fired OCGTs, CCGTs and Dual-fuel GTs with a Thermal Input Rating of 50MWth or Greater Operating <500 Hours Per Year' dated October 2018. The content of this document has been agreed in principle by the Environment Agency and we have therefore taken the document into account during our determination of this variation.

In order to prevent or reduce NOx emissions to air from the combustion of gas oil in gas turbines, BAT is to use one or a combination of the techniques given in BAT 37. The Operator has considered the following techniques as those potentially applicable to gas turbines firing gas oil and operating less than 500 hours per year:

- a. Water/Steam injection;
- b. Use of Dry Low NOx burners.

The JEP cost benefit analysis (Appendix A to *BAT Assessment for Existing Gas and Liquid Fuel Fired OCGTs, CCGTs and Dual-fuel GTs with a Thermal Input Rating of 50MWth or Greater Operating <500 Hours Per Year)* concludes that retrofitting Dry Low NOx (DLN) or Wet Low Emissions (WLE) to existing OCGTs firing natural gas or gas oil, and operating for less than 500 hour per year, is not justified from a cost-benefit perspective. Meaning there is insufficient environmental benefit in reducing the already low annual mass emission, when considering the high conversion costs.

The gas turbines are a mix of Olympus 'A' and 'B' rated engines installed in the late 1970's. The Operator has concluded that, as retrofit packages for older Olympus engines are not available, the currently permitted performance along with continued appropriate maintenance, are BAT to prevent or reduce emissions of NOx from these gas turbines.

We agree that the techniques reported under BAT conclusion 37 are not applicable to LCP 390 and LCP 391.

In all cases, the minimum BAT requirements are considered to be: i) the continued compliance with any permit requirements already in place to protect air quality and ii) the demonstration of an appropriate maintenance regime to maintain plant emissions performance.

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

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; iii. 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; iv. application of sectoral benchmarking on a regular basis. Etc - see BAT Conclusions	CC	The Operator confirmed that there is an EMS certified to ISO 14001 in place that the certification is consistent with the requirements of BAT 1.

BAT Concn. Numbe r	Summary of BAT Conclusion red	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			
		el of detail) and nature of the EMS (e.g. starter, scale and complexity of the installation				
2	BAT is to determine the net electric energy efficiency of the gasification load (1), according to EN standard significantly affect the net electrica energy efficiency of the unit. If EN international standards that ensure	ing out a performance test at full I after each modification that could tion and/or the net mechanical e ISO, national or other	CC	The BAT-AEELs are not applicable to plant operating <1500 hours. There have been no performance tests carried out at Taylors Lane due to limited running of the plant. The Operator provided confirmation of the name plate efficiency, which we consider adequate for this plant. The manual for the plant states a station thermal efficiency figure of 26.2% at normal peak rating. 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	r and water including those	NA	We do not require monitoring for these parameters where no	
	Stream	Parameter(s)	Monitoring		periodic or continuous monitoring	
	Flue-gas	Flow	Periodic or continuous determination		is specified in the permit.	
		Oxygen content, temperature, and pressure	Periodic or continuous measurement		No flue gas treatment is	
		Water vapour content (3)			undertaken on site.	
	Waste water from flue-gas treatment	Flow, pH, and temperature	Continuous measurement			
4		with at least the frequency given below an BAT is to use ISO, national or other intescientific quality.		СС	OCGTs operating for <500 hours are subject to indicative daily BAT-AELs only. The monitoring	

BAT Concn. Numbe r	Summary of	BAT Conclusion requireme		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			
	Substance/P arameter	Fuel/Process/Type of combustion plant	Combustion plant total rated thermal input	Standard(s)_(⁴)	Minimum monitoring frequency_(*)	Monitoring associated with		frequencies described in BAT 4 do not apply where plant operation would be for the sole purpose of performing or emission
	NH ₃	When SCR and/or SNCR is used	All sizes	Generic EN standards	Continuous (6) (7)	BAT 7		measurement. We have specified monitoring
	NOx	 Coal and/or lignite including waste coincineration Solid biomass and/or peat including waste coincineration 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_(°)_(*)	BAT 20 BAT 24 BAT 28 BAT 32 BAT 37 BAT 41 BAT 42 BAT 43 BAT 47 BAT 48 BAT 56 BAT 64 BAT 65 BAT 73		against the indicative AELs through emission factors in table S3.1a. Concentrations of NOx, CO and SO ₂ are calculated every 2 years based on fuel usage and emissions factors, according to the agreed protocol described in JEP Report JEP17EMG02 / UTG/18/ERG/CT/773/R 'Maintaining the Emissions Performance of Open Cycle Gas Turbines that operate for less than 500 hours per year', October 2018.
		Combustion plants or offshore platforms	All sizes	EN 14792	Once every year (9)	BAT 53		There is no SCR/SNCR on site
	N ₂ O	Coal and/or lignite in circulating fluidised bed boilers	All sizes	EN 21258	Once every year (10)	BAT 20 BAT 24		and therefore no requirement to monitor ammonia or SO ₃ .
		Solid biomass and/or peat in circulating fluidised bed boilers						
	СО	Coal and/or lignite including waste co- incineration	All sizes	Generic EN standards	Continuous_(6)_(8)	BAT 20 BAT 24 BAT 28 BAT 33 BAT 38 BAT 44		

BAT Concn. Numbe r	Summary of	BAT Conc	lusion 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				
		inclinci	ocess fuels from the				BAT 49 BAT 56 BAT 64 BAT 65 BAT 73		
		— IGC	emical industry CC plants mbustion plants on	All sizes	EN 15058	Once every year (9)	BAT 54		
	SO ₂	— Coxwas — Sol incl — HFi boi — HFi eng — Gas — Iror gas — Proche boi	al and/or lignite incluste co-incineration lid biomass and/or peat I waste co-incineration O- and/or gas-oil-fired lers O- and/or gas-oil-fired gines s-oil-fired gas turbines in and steel process sees occess fuels from the emical industry in lers CC 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	— Wh	nen SCR is used	All sizes	No EN standard available	Once every year	_		
	Gaseous chlorides,	— Coa	al and/or lignite	All sizes	EN 1911	Once every three months 6 (13) (14)	BAT 21 BAT 57		

BAT Concn. Numbe r	Summary of I	BAT C	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			
	expressed as HCI	_	Process fuels from the chemical industry in boilers						
		_	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 Process fuels from the chemical industry in boilers	All sizes	No EN standard available	Once every three months 6 13 (13)	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_(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 Waste co-incineration	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		
					standards and EN 13284-2		BAT 69		
	Metals and metalloids except mercury	_ _	Coal and/or lignite Solid biomass and/or peat	All sizes	EN 14385	Once every year (18)	BAT 22 BAT 26 BAT 30		

BAT Concn. Numbe r	Summary of E	BAT C	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				
	(As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Tl, V,	_	HFO- and/or gas-oil-fired boilers and engines						
	Zn)	_	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		
	Hg	_	Coal and/or lignite including waste co-	< 300 MW _{th}	EN 13211	Once every three months (13) (20)	BAT 23		
			incineration	≥ 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	All sizes	EN 12619	Once every six months_(13)	BAT 33 BAT 59		
		_	Process fuels from chemical industry in boilers						
		_	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		

BAT Concn. Numbe r	Summary of BAT Concl	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		
5	accordance with EN st	andard	water from flue-gas treatment wit s. If EN standards are not availa	NA	The site does not carry out fluegas treatment.		
		nternational standards that ensure the provision of data of an equi Substance/Parameter Standard(s)		Minimum monitoring frequency	Monitoring associated with		
	Total organic carbon (TO	C) (²⁶)	EN 1484	Once every month	every month BAT 15		
	Chemical oxygen demand (COD) (26)		No EN standard available	,			
	Total suspended solids (T	SS)	EN 872				
	Fluoride (F ⁻)		EN ISO 10304-1	1			I
	Sulphate (SO ₄ ²⁻)		EN ISO 10304-1				
	Sulphide, easily released (S ²⁻)		No EN standard available				
	Sulphite (SO ₃ ²⁻)	. ,	EN ISO 10304-3				
	Metals and metalloids Chloride (Cl ⁻)	As Cd Cr Cu Ni Pb Zn Hg	Various EN standards available (e.g. EN ISO 11885 or EN ISO 17294-2) Various EN standards available (e.g. EN ISO 12846 or EN ISO 17852) Various EN standards available (e.g. EN ISO 10304-1 or EN ISO 15682)		_		
	Total nitrogen		EN 12260				
6	In order to improve the air of CO and unburnt combination of the techn	CC	In order to improve the general environmental performance of the plant at Taylors Lane, regular planned maintenance (b) is				
	Technique		Description	Applicab	mity		carried out according to the

BAT Concn. Numbe r	Si	ummary of BAT Ce	onclusion 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	
		a. Fuel blending and mixing b. Maintenance of the combustion system c. Advanced control system d. Good design of the combustion equipment e. Fuel choice	reduce the emission of pollutants by mixing different qualities of the same fuel type Regular planned maintenance according to suppliers' recommendations	The applicability to old combustion plants may be constrained by the need to retrofit the combustion system and/or control command system Generally applicable to new combustion plants 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		supplier recommendations. Low sulphur fuel (e) (to meet legal requirements) is also utilised. The combustions units are approximately 40 years old. Due to the nature and age of the plant and the fuels used on the OCGTs the following techniques are not carried out: fuel blending and mixing (a), it does not have an advanced control system (c) and good design of the combustion equipment (d) is generally only applicable to new plant.
7	ar ar B . Ti is ac	elective non-catalytical/or operation of State optimum size of AT-associated emore BAT-associated < 3–10 mg/Nm³ as thieved when using patement technique	nissions of ammonia to air from the use of a reduction (SNCR) for the abatement of NCR and/or SNCR (e.g. optimised reagent the reagent drops). ission levels emission level (BAT-AEL) for emissions of a yearly average or average over the same SCR and the upper end of the range cans. In the case of plants combusting biomastombusting HFO and/or gas oil, the higher	NA	Not applicable - no SCR or SNCR on site.	
8	ap			erating conditions, BAT is to ensure, by on abatement systems are used at optimal	NA	The gas turbines are not fitted with emissions abatement

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
9	In order to improve the general enveduce emissions to air, BAT is to programmes for all the fuels used, as (i) Initial full characterisation of the fustandards. ISO, national or other in equivalent scientific quality; (ii) Regular testing of the fuel quality to design specifications. The freque variability of the fuel and an asset treatment employed); (iii) Subsequent adjustment of the procharacterisation and control in the Characterisation and regular tell performed by the supplier, the full specification and/or guarantee. Fuel(s)	СС	The Operator has confirmed that Taylor's Lane meets the relevant sections of the JEP Characterisation of Power Plant Fuels for Compliance with LCP BREF Conclusion BAT 9 (UTG/19/APA/FT/662/R, October 2019). We have referenced the above JEP protocol in Table S1.2 of the consolidated permit. The Operator has also confirmed that the sites EMS will be updated to incorporate the requirements of section 4.5 of the JEP protocol.	
	Biomass/peat Coal/lignite	Substances/Parameters subject to characterisation LHV moisture Ash C, CI, F, N, S, K, Na Metals and metalloids (As, Cd, Cr, Cu, Hg, Pb, Zn) LHV Moisture Volatiles, ash, fixed carbon, C, H, N, O, S Br, CI, F		
	HFO	 Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn) Ash C, S, N, Ni, V 		

BAT Concn. Numbe r	Summary of BAT Conclusion 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	
	Gas oil Natural gas	— Ash — N, C, S — LHV		
	Process fuels from the chemical industry (27)	 — CH₄, C₂H₆, C₃, C₄+, CO₂, N₂, Wobbe index — Br, C, Cl, F, H, N, O, S 		
	Iron and steel process gases	 Metals and metalloids (As, Cd, Co, Cr, Cu, Hg, Mn, Ni, Pb, Sb, Tl, V, Zn) LHV, CH₄ (for COG), C_XH_Y (for COG), CO₂, H₂, N₂, total sulphur, dust, Wobbe index 		
	Waste_(28)	 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) 		
10	is to set up and implement a manag commensurate with the relevance of mappropriate design of the systems water and/or soil (e.g. low-load digeneration in gas turbines), — set-up and implementation of a sp — review and recording of emissions actions if necessary, — periodic assessment of the over	and/or to water during other than normal operating conditions (OTNOC), BAT ement plan as part of the environmental management system (see BAT 1), for potential pollutant releases, that includes the following elements: considered relevant in causing OTNOC that may have an impact on emissions to air, esign concepts for reducing the minimum start-up and shutdown loads for stable ecific preventive maintenance plan for these relevant systems, caused by OTNOC and associated circumstances and implementation of corrective erall emissions during OTNOC (e.g. frequency of events, duration, emissions ementation of corrective actions if necessary.	CC	The existing site EMS incorporates the key aspects of BAT 10. The site operates a risk based review with the EMS which includes a review of potential impacts of OTNOC. The power station was purpose designed to minimise environmental impact throughout during operational / non-operational conditions. e.g. primary, secondary and tertiary containment measures to prevent emissions to soil or water from

BAT Concn. Numbe r	Sun	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	
11	Des The if th duri for a	ccription monitoring can be c is proves to be of e ng start-up and shute a typical SU/SD proc	monitor emissions to air and/or to water during arried out by direct measurement of emissions equal or better scientific quality than the direct down (SU/SD) may be assessed based on a directure at least once every year, and using the and every SU/SD throughout the year.	s or by monitoring of surrogate parameters ct measurement of emissions. Emissions etailed emission measurement carried out	СС	The requirements described in BAT 11 should not apply where plant operation would be for the sole purpose of performing emissions measurement. A visual inspection of surface water is carried out twice a day for visible oil and grease.	
12			energy efficiency of combustion, gasification rate combination of the techniques given below		NA Not applicable - Only applicable plant which operates more than		
		Technique	Description	Applicability		1500 hours per year.	
	a.	Combustion optimisation	See description in Section 8.2. Optimising the combustion minimises the content of unburnt substances in the flue-gases and in solid combustion residues	Generally applicable			
	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				
	C.	Optimisation of the steam cycle					
	d.	Minimisation of energy consumption					
	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			

BAT Concn. Numbe r	Sun	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	
	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		
	cogeneration (CHP) 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		industrial processes/activities or in a public network for district heating. Additional heat recovery is possible from: — flue-gas	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		
	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		

BAT Concn. Numbe r	Sun	nmary of BAT Co	nclusion 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		
		Minimizer		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 healosses	tl 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			
	S.	Supercritical and ultra-supercritical steam conditions	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	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		rder to reduce wat of the techniques	er usage and the volume of contaminated wast given below.	e water discharged, BAT is to use one or	CC	There is no scope for water recycling, there is no steam or	
		Technique	Description	Applicability		cooling circuit for this plant and	
	a.		sidual aqueous streams, including run-off water, from plant are reused for other purposes. The degree of	Not applicable to waste water from cooling systems when water treatment chemicals		therefore no use of water in the process.	

BAT Concn. Numbe r	Sur	nmary of BAT	Conclusion 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		
	recycling is limited by the quality requirements of the recipient water stream and the water balance of the plant				and/or high concentrations of salts from seawater are present		Dry bottom ash handling is not applicable to the installation, as this applies only to plants using
	b.	Dry bottom ash handling	Dry, hot bottom ash mechanical convey ambient air. No wat	Only applicable to plants combusting solid fuels. There may be technical restrictions that prevent retrofitting to existing combustion plants		solid fuel.	
14	to s Des Wa was App	egregate waste scription ste water strean ste water from fl plicability	water streams anns that are typicallue-gas treatment.	d to treat them separately, de	ter and to reduce emissions to water, BAT is epending on the pollutant content. ude surface run-off water, cooling water, and eto the configuration of the drainage systems.	CC	The only water discharge from the installation is surface water runoff. This is discharged to Mitchell Brook via discharge points W1, W2 and W3. W1 discharges via an interceptor.
15	tech				T is to use an appropriate combination of the se as possible to the source in order to avoid	NA	Not applicable- no flue-gas treatment
		Techni	que	Typical pollutants prevented/abated	Applicability		
				Primary techniques			
	a.		oustion (see BAT 6) atment systems R, see BAT 7)	Organic compounds, ammonia (NH ₃)	Generally applicable		
				ì			
	b.	Adsorption on a	ctivated carbon				
	C.	Aerobic biologic	cal treatment				
	d.	Anoxic/anaerob treatment	ic biological	Mercury (Hg), nitrate (NO $_3$ $^-$), nitrite (NO $_2$ $^-$)	Generally applicable		

BAT Concn. Numbe r	Sur	nmary 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
	e.	Coagulation and flocculation	Suspended solids		Generally applicable		
	f.	Crystallisation	Metals and metalloid (SO ₄ ²⁻), fluoride (F ⁻)	s, sulphate	e Generally applicable		
	g.	Filtration (e.g. sand filtration, microfiltration, ultrafiltration)	Suspended solids, m	netals	Generally applicable		
	h.	Flotation	Suspended solids, fre	ee oil	Generally applicable		
	i.	Ion exchange	Metals		Generally applicable		
	j.	Neutralisation	Acids, alkalis		Generally applicable		
	k.	Oxidation	Sulphide (S ²⁻), sulphi	ite (SO ₃ ²⁻)	Generally applicable		
	l.	Precipitation	Metals and metalloid: (SO ₄ ²⁻), fluoride (F ⁻)	s, sulphate	e Generally applicable		
	m.	Sedimentation	Suspended solids		Generally applicable		
	n.	Stripping	Ammonia (NH ₃)		Generally applicable		
		allation.	lischarges to a recei		dy at the point where the emission leaves the er body from flue-gas treatment BAT-AELs		
					Daily average		
	Tot	al organic carbon (TOC)		20	-50 mg/l (30) (31) (32)		
	Ch	emical oxygen demand (COD)		60	-150 mg/l (30) (31) (32)		
	Tot	al suspended solids (TSS)		10	–30 mg/l		
	Fluoride (F ⁻) Sulphate (SO ₄ ²⁻) Sulphide (S ²⁻), easily released			10	–25 mg/l <u>(³²)</u>		
				1,3	$3-2,0 \text{ g/l} (3^2) (3^3) (3^4) (3^5)$		
				0,1	1–0,2 mg/l <u>(³²)</u>		
	Sul	phite (SO ₃ ²⁻)		1-	20 mg/l <u>(³²)</u>		
	Me	tals 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	2–3 μg/l		

BAT Concn. Numbe r	Sui	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
				Ni	10–50 μg			
				Pb	10–20 μg			
				Zn	50–200 μ	g/I		
16	aba		BAT is to organise operatio			bustion and/or gasification process and lise, in order of priority and taking into	CC	There are no wastes arising from the combustion process.
	(a	-	e.g. maximise the proportion	of residu	ues which	arise as by-products;		The waste hierarchy is applied
	(b) waste preparation	for reuse, e.g. according to	the specif	fic request	red quality criteria;		when disposing of other waste streams which arise as part of site
	(c) waste recycling	j;					operations.
	(d) other waste red	covery (e.g. energy recovery)	,				
	by	implementing an app	propriate combination of techr	niques su	ch as:	,		
		Technique	Description					
	a.	Generation of gypsum as a by- product	Quality optimisation of the calci residues generated by the wet be used as a substitute for mine raw material in the plasterboard quality of limestone used in the the purity of the gypsum produc	FGD so the ed gypsum d industry). wet FGD	at they can n (e.g. as . The	Generally applicable within the constraints associated with the required gypsum quality, the health requirements associated to each specific use, and by the market conditions		
	b. Recycling or recovery of residues (e.g. from semi-dry desulphurisation processes, fly ash, bottom ash) as a construction sector Recycling or recovery of residues (e.g. from semi-dry desulphurisation processes, fly ash, bottom ash) associated with the required material quality (e.g. physical properties, content of harmful substances) associated to each specific use, and by the market conditions							
	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.	Preparation of spent catalyst for reuse Preparation of sent 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 Combustion cnamber 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						

BAT Concn. Numbe r	Su	mmary of BAT Conc	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		
17	In o		emissions, BAT is to use one or a combinati		CC	The Operator has confirmed that the following operational
	b. c. d.	Technique Operational measures Low-noise equipment Noise attenuation Noise-control equipment Appropriate location	 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 This potentially includes compressors, pumps and disks Noise propagation can be reduced by inserting obstacles between the emitter and the receiver. Appropriate obstacles include protection walls, embankments and buildings This includes: noise-reducers equipment insulation enclosure of noisy equipment soundproofing of buildings Noise levels can be reduced by increasing the 	equipment is new or replaced Generally applicable to new plants. In the case of existing plants, the insertion of obstacles may be restricted by lack of space The applicability may be restricted by lack of space Generally applicable to new plant		measures are employed at the site in order to reduce noise emissions: • Inspection and maintenance of equipment; • closing of doors and windows of enclosed areas where possible; • equipment operated by experienced staff. • Noise reducing insulation is fitted on equipment where possible; and • noisy equipment is enclosed in buildings The Operator undertakes regular environmental noise surveys. They confirm that no noise issues have been raised and the site have not received any complaints from neighbours.
		of equipment and buildings	distance between the emitter and the receiver at by using buildings as noise screens	iu		
Combust	tion	of liquid fuels			1	
Table 13		BAT-associated er Type of combus	nergy efficiency levels (BAT-AEELs) for HFC	NA	Not applicable to gas turbines.	

BAT Concn. Numbe r	oncn.							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
				Net electrical e	efficiency (%)	Net tot utilis (%)	ation		
				New unit					
	HF	O- and/or gas-oil-fire	d boiler	> 36,4	35,6–37,4	80–96	80–96		
28		order to prevent or re O and/or gas oil in bo	ilers, BAT is to use		of the techniques give		mbustion of	NA	Not applicable to gas turbines.
		Technique	Description		Applicability				
	l	Air staging	See descriptions in Section 8.3	Generally applicable)				
	b.	Fuel staging	III Section 6.5						
	C.	Flue-gas recirculation							
	d.	Low-NO _X burners (LNB)							
	e.	Water/steam addition		Applicable within the	e constraints of water	availability			
	f.	Selective non- catalytic reduction (SNCR)		highly variable boiled The applicability may	mbustion plants operar r loads. y be limited in the cas 00 h/yr and 1 500 h/y				
	g.	Selective catalytic reduction (SCR)	See descriptions in Section 8.3	There may be techn existing combustion 1 500 h/yr.	mbustion plants opera ical and economic res plants operated betw able to combustion pla	strictions for een 500 h/y	retrofitting r and		
	h.	Advanced control system		to old combustion pl	to new combustion pants may be constrain on system and/or con	ned by the n	eed to		

BAT Concn. Numbe r	Su	mmary of BAT Concl	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				
	i.	Fuel choice		of different type policy of the Me	es of fuel, w ember State	vhich may be e	ciated with the availability impacted by the energy		
	ı	BAT-associated emis		NELs) for NO _X end/or gas oil in		to air from	the combustion of HFO		
		Combustion plant total		J		_s (mg/Nm³)			
		thermal input (MW _{th})	Y	early average	D		e or average over the pling period		
			New plant	Existing plant (10		ew plant	Existing plant (103)		
	<	100	75–200	150–270	100)–215	210–330 <u>(104)</u>		
	≥	100	45–75	45–100 <u>(10</u>	<u>5)</u> 85–	-100	85–110 <u>(106)</u> <u>(107)</u>		
	_	- 10-30 mg/Nm³ for ex plants of <100 MW _{th} ,	isting combustion pl	ssion levels will generally be: lants of < 100 MW _{th} operated \geq 1 500 h/yr, or new combustion lants of \geq 100 MW _{th} operated \geq 1 500 h/yr, or new combustion					
29		order to prevent or red lers, BAT is to use one					on of HFO and/or gas oil in	NA	Not applicable to gas turbines.
		Technique	Description		A	Applicability	1		
	a.	Duct sorbent injection (DSI)	See description in Section 8.4	Generally app	olicable				
	b.	Spray dry absorber (SDA)							
	c.	Flue-gas condenser							
	d.	Wet flue-gas desulphurisation (wet FGD)		the technique	to combus	tion plants o	ic restrictions for applying f < 300 MW _{th} . pperated < 500 h/yr.		

BAT Concn. Numbe r	Su	ımmary of BAT Conclu	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						
				re	There may be technical and economic restrictions for retrofitting existing combustion plants operated between 500 h/yr and 1 500 h/yr					
	е	. Seawater FGD	the ted Not ap There retrofit			There may be technical and economic restrictions for applying the technique to combustion plants of < 300 MW _{th} . Not applicable to combustion plants operated < 500 h/yr. There may be technical and economic restrictions for etrofitting existing combustion plants operated between 500 h/yr and 1 500 h/yr				
	f.	Fuel choice BAT-associated emiss	sion levels							
	lr.	Combustion plant tota	l rated	and/d	or gas oil i		<u>'s</u> Ls for SO₂ (mg/	Nm³\		
		thermal input (MW _{th})	Traicu	Yearly average			Daily average or average over the sampling period			
				New plant	Existi plant_		New plant	Existing plant (109)		
	<	300		50–175	50–175		150–200	150–200 <u>(¹¹⁰)</u>		
	≥	300		35–50	50–110		50–120	150–165 <u>(111)</u> <u>(112)</u>		
30		order to reduce dust an boilers, BAT is to use or						ustion of HFO and/or gas oil	NA	Not applicable to gas turbines.
		Technique		Description			Applic	ability		
	а	Electrostatic precipitator (ESP)	See des 8.5	cription in S	Section Generally applicable					
	b	b. Bag filter c. Multicyclones See description in 8.5.				on				
	С				ection					

BAT Concn. Numbe r	Su	mmary of BAT (Conclusion req	uirement					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
			combin	clones can ation with c ng techniqu	ther					
	d.	Dry or semi-dry system	8.5. The ted	scriptions ir hnique is m	nainly used					
	desulphurisation (wet 8.5. FGD) The tech		scription in hnique is m , HCl and/c	nainly used	See applicability in BAT 29					
	f.	Fuel choice	See de 8.5	Scription in Section Applicable within the constraints associated with the availability of different types of fuel, which may be impacted by the energy policy of the Member State						
		BAT-associated	emission level		Ls) for dua /or gas oil			the combustion of HFO		
		Combustion plan			BAT-AELs for dust (mg/Nm³)					
		thermal i (MW _{th}		Ye	arly average	•	Daily average or average over the sampling period			
				New plant	Exist plant		New plant	Existing plant_(114)		
	< 3	300		2–10	2–20		7–18	7–22 <u>(¹¹⁵)</u>		
	≥ 3	300		2–5	2–10		7–10	7–11 <u>(116)</u>		
31	In order to increase the energy efficuse an appropriate combination of the			iency of HF	O and/or g	gas oil co BAT 12	mbustion in recipand below.	to NA	Not applicable to gas turbines.	
	1 1	Technique	Description				Applicability		71	
	a.		ee description in ection 8.2	Gene	rally applical	ole to new	units operated ≥ 1	500 h/yr.		

BAT Concn. Numbe r	Sui	mmary of BAT Conclusio	n 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		
		BAT-associated energy e						
				ocating engines		ELs <u>(119)</u>		
					Net electrical ef	ficiency (% <u>) (¹²⁰)</u>		
					New unit	Existing unit		
	HF	O- and/or gas-oil-fired recipro	cating engine — single	cycle	41,5–44,5 <u>(121)</u>	38,3–44,5 <u>(121)</u>		
	HF	O- and/or gas-oil-fired recipro	cating engine — comb	ned cycle	> 48 <u>(122)</u>	No BAT-AEEL		
32		order to prevent or reduce pines, BAT is to use one or				s oil in reciprocating	NA	Not applicable to gas turbines.
		Technique	Description		Applicability			
	a.	Low-NO _X combustion concept in diesel engines	See descriptions in Section 8.3	Generally applicable				
	b.	Exhaust-gas recirculation (EGR)		Not applicable to four-s	ot applicable to four-stroke engines			
	C.	Water/steam addition		Applicable within the co The applicability may b available				
	d.	Selective catalytic reduction (SCR)		Not applicable to comb There may be technica existing combustion pla h/yr. Retrofitting existing cor availability of sufficient	I and economic restrice ants operated between an annual may be a support of the control of the c	etions for retrofitting n 500 h/yr and 1 500		
33		order to prevent or reduce O and/or gas oil in reciproc					NA	Not applicable to gas turbines.
		Technique	Description		Applicability			
	a.	Combustion optimisation		Generally applicat	ole			!

BAT Concn. Numbe r	Su	mmary of BAT Concl	usion requirement					N	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.	Oxidation catalysts	See descriptions in 8.3	-			n plants operated < 500 h/y ited by the sulphur content			
		BAT-associated emis				ssions to air fro ng engines	m the combustion of H	IFO		
		Combustion plant total	rated		В	AT-AELs (mg/Nn	n³)			
		thermal input (MW_{th})	Y	early averag	je		rage or average over the sampling period			
			New plant		sting nt <u>(¹²³)</u>	New plant	Existing plant (124) (12	<u>5)</u>		
	≥ !	50	115– 190 <u>(126)</u>	125–62	5	145–300	150–750			
34	In (nts burning only HFO, the yearly average (the average over the order to prevent or red iprocating engines, BA	sampling period for uce SO _X , HCl and	s oil in N	NA .	Not applicable to gas turbines.				
		Technique	Description	·						
			See descriptions Section 8.4	See descriptions in Applicable withi			ithin the constraints associated with the availability of is of fuel, which may be impacted by the energy policy er State			
				There may be technical restrictions in the case of existing combustion plants Not applicable to combustion plants operated < 500 h/yr						
	C.		lue-gas phurisation (wet			There may be technical and economic restrictions for applying the technique to combustion plants of < 300 MW $_{\rm th}$. 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				

BAT Concn. Numbe r	Sun	nmary of BA	T Conclusion 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				
	В	BAT-associat	ed emission levels						
		Combustion p	lant total rated	luror gae	s oil in reciprocating BAT-Al	ELs for SO ₂ (mg/N	m³)		
		therma	al input W _{th})	Y	early average		ge or average over the npling period		
				New Existing plant plant (127)		New plant			
	All :	sizes		45–100	100–200 <u>(129)</u>	60–110	105–235 <u>(129)</u>		
35		oil in reciproc	cating engines, BAT	is to use	ulate-bound metal en one or a combinatio	n of the technique	combustion of HFO and/or es given below.	NA	Not applicable to gas turbines.
	l	Technique	Descriptio			Applicability			
	a.	Fuel choice	See descriptio Section 8.5	d	Applicable within the cor different types of fuel, wh Member State				
		Electrostatic precipitator (ES	SP)	N	Not applicable to combustion plants operated < 500 h/yr				
	c.	Bag filter							
	BAT-associated emission levels ar Combustion plant total rated thermal input (MW _{th})			nd/or gas	s oil in reciprocating	g engines ELs for dust (mg/N Daily averag			
			New plant	Existing plant (130)	New plant	npling period Existing plant (131)			
	≥ 50	0		5–10	5–35	10–20	10–45		
36			se the energy effic e techniques given		gas oil combustion ir 2 and below.	n gas turbines, B	СС	The techniques given in BAT 12 are not applicable to plant which	
	Т	echnique	Description			Applicability			operates less than 1500 hours per
		Combined cycle	See description in Section 8.2	Appl	Generally applicable to new units operated ≥ 1 500 h/yr. Applicable to existing units within the constraints associated with the steam cycle design and the space availability.				year.

BAT Concn. Numbe r	Sui	mmary of BAT Concl	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			
					ting units operated <	<u> </u>		The gas turbines at the facility are open cycle, operated for less than 500 hours, therefore the
			ted energy efficienc f combustion unit	cy levels (BAT-	l.	il-fired gas turbines AT-AEELs (132)	$\neg \mid$	techniques specified in BAT 36
		Турс о	Combustion unit			rical efficiency (%) (133)	-	are not applicable.
					New unit	Existing unit		OCGT operating <500 hours per
	Ga	as-oil-fired open-cycle ga	s turbine		> 33	25–35,7		year and therefore BAT-AEELs
	Ga	as-oil-fired combined cyc	le gas turbine		> 40	33–44		are not applicable. The Regulation 61 response confirms that the
37		or a combination of t	he techniques given			oil in gas turbines, BAT is to u	se CC	requires energy efficiency monitoring after an overhaul. We consider that the techniques described by this BAT conclusion
		Technique	Description	Applicability			_	are not applicable to the OCGTs because:
	a.	Water/steam addition	See description in Section 8.3		y may be limited due			
	b.	Low-NO _x burners (LNB)	Section 6.3	Only applicable available on the		r which low-NO _X burners are		 They operate less than 500 hours per year;
	c. Selective catalytic reduction (SCR)		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. Retrofitting existing combustion plants may be constrained by the availability of sufficient space			r.	 There are currently no NOx emission reduction options available; Selective catalytic reduction (SCR) is not applicable to combustion plants operated less than 500 hour year. 	
								In making this assessment, we have considered the reference technical information available within the Joint Environmental Programme (JEP) report

BAT Concn. Numbe r	Si	ummary of	BAT Cond	clusion 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			
									UTG/18/PMP/774/R. Further details are discussed in the key issues section.
38		ne or a cor	mbination o	f the techniq	ues given		ustion of gas oil in gas turbines, BAT is to use	СС	Oxidation catalysts are not applicable to combustion plants operated < 500 h/yr.
	=	a. Combust optimisat	tion			Generally applical	Applicability ble		BATc 38 provides an indicative emission level of 250 mg/Nm³ for combustion of gas oil in dual fuel gas turbines operating less than
	-	b. Oxidation		Section 8.3		Not applicable to combustion plants operated < 500 h/yr. Retrofitting existing combustion plants may be constrained by the availability of sufficient space			
	tu		mergency (use operated			m the combustion of gas oil in dual fuel gas 45–250 mg/Nm³ as a daily average or average		500 hours per year. This indicative figure is not strictly applicable to LCP 390 and LCP 391, because the gas turbines are not dual fuel. However, we have set a benchmark emission level at 250 mg/Nm³ based on the emissions reported by the Operator.
39				duce SO _x an given below.	d dust em	issions to air from t	the combustion of gas oil in gas turbines, BAT	СС	Low sulphur fuel is utilised.
		Гесhnique		ription			Applicability		The <u>yearly</u> BAT-AELs for SO ₂ and
		r. Fuel choice	See desc Section 8	.4	of fuel, whi	ch may be impacted l	associated with the availability of different types by the energy policy of the Member State		dust are not applicable to existing plants operating for less than 1500 hours per year.
		BAT-assoc	ciated emis			nd dust emission: ncluding dual fuel	s to air from the combustion of gas oil in		
				9.01		BAT-AELs	(mg/Nm³)		Footnote 2 Table 22 in BAT 39 states that <u>daily</u> average BAT-
İ	١L				SO_2		Dust		AELs for SO ₂ and dust are

BAT Concn. Numbe r	Summary of BAT	Conclusion 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			
	Type of combustion plant	Yearly average <u>(134)</u>	Daily average or average over the sampling period (135)	Yearly average <u>(¹³⁴)</u>	Daily average or average over the sampling period (135)		indicative for existing plants operated less than 500 hours per year. The operator has confirmed
	New and existing plants	35–60	50–66	2–5	2–10		that the plant can achieve the BAT AELS for SO ₂ and Dust.
							The indicative BAT-AEL requirement for SO ₂ is satisfied for gas oil by restricting the sulphur content of the fuel to 0.1%, by mass, in line with the Sulphur Content of Liquid Fuels Regulations.
							The indicative BAT-AEL for dust is satisfied by restricting the maximum ash content of gas oil to 0.01% by mass.

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 three current discharges to controlled waters identified as W1 to W3 to Mitchell 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:

Energy efficiency

The BAT for balancing plant guidance (Working draft, 2018) sets out additional restrictions on hours for <1500 hour non-emergency plant which are low efficiency. Table 1 of the guidance sets out categories for LCP peaking plant. The LCP at Taylor's Lane Power Station falls into category B because it's NOx emissions are below 500 mg/m³ and its efficiency, at 26.2%, is above that set out in table 2 of the guidance for this type of plant and fuel (25.7%). Table 1 therefore confirms that there are no additional restrictions applied to the hours of operation.

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	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.								
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 3.5.5 relating to the need for MCERTS. However, this condition has been updated to correct the reference of condition 3.5.3.
Improvement programme	Based on the information on the application, we consider that we need to impose an improvement programme.
	We have imposed an improvement programme to ensure that:
	the operator will have a plan in place to ensure that the fuel is characterised in line with BAT 9.
	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.
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 dioxide Carbon monoxide
	Sulphur dioxide
	Dust
	These are described in the relevant BAT Conclusions in Section 5 of this document.

Aspect considered	Decision
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.