

Offshore Combustion

Installations (PPC)

PPC LCP BREF: PRO-FORMA TO REQUEST A DEROGATION

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# Background information

This proforma must accompany all requests for an LCP NOx BAT-AEL derogation from offshore PPC permit holders.

The purpose of this proforma is to record all information submitted and act as summary evidence in respect of an LCP derogation request. The Department will use the completed information in this form including the cost benefit analysis and required supporting information to assess the derogation request and to reach its decision to grant or reject.

This form maybe used to capture more than one derogation request where Open Cycle Gas Turbines (OCGT) are operated in parallel, are the same make, model and specification, and the cost benefit analysis and options appraised are the same for the individual asset – i.e. same approach on each turbine.​

All derogation requests must be submitted by email to [bst@beis.gov.uk](mailto:bst@beis.gov.uk) by the 30 November 2020.

# Derogation request information

## Installation Operator Information

|  |  |
| --- | --- |
| Installation Operator |  |
| SAT Reference | PPC/ |
| Name or identifier of the offshore installation (as per PPC permit) |  |
| Name of Primary Contact |  |
| Contact Position |  |
| Telephone Number |  |
| Email Address |  |

## Derogation Assessment

Provide a brief description of why you are requesting an LCP NOx BAT-AEL derogation and a summary for each LCP derogation request as follows:

* Number of derogations requested in this application (see section 2.2.1).
* Details and description of equipment included (see section 2.2.2).
* Operating load of equipment included (see section 2.2.2).

It is expected that further supporting evidence will be submitted including, for example:

* Evidence supporting assessment of operational loads.
* Emissions monitoring data to support expected concentrations i.e. the relevant BAT-AEL limit and a summary of the NOx concentrations when operating above 70% of the base load rated output (see section 2.2.3).

### 2.2.1 Number of Derogations requested

OCGT(s) listed here are only for those not meeting the LCP NOx BAT-AEL and requiring a derogation. More than one OCGT may be listed and derogation requested where all plant run in parallel and are identical performing the same duty. In this instance, the CBA tool options and qualitative information may be the same for each gas turbine.​

Please state the number of derogation requests included in this submission in the box below.

As above, where this submission includes identical equipment, it is acceptable to provide one cost benefit analysis for multiples of identical equipment. In all other cases, specific CBA’s must be provided for each OCGT.

|  |  |
| --- | --- |
| How many OCGT are you requesting for a derogation? |  |

### 2.2.2 Details and description of equipment included

List all OCGT requiring a derogation as it appears in your current PPC permit, the information in this table should be checked against the PPC permit for completeness.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| No. of Derogation requests | Equipment Name and Model | TAG / Facility No. | Normal Operation Plant Load (MW(e)) | Base Load Rated Output (MW) | Maximum Thermal Input (MW(th)) |
| 1. |  |  |  |  |  |
| 2. |  |  |  |  |  |
| 3. |  |  |  |  |  |
| 4. |  |  |  |  |  |

### 2.2.3 Expected achievable NOx concentrations in comparison to the BAT AEL

Provide in the table below the expected achievable NOx concentration for each OCGT that is proposed as part of the derogation request. The NOx emission limit value is at the max projected operating load.

|  |  |  |  |
| --- | --- | --- | --- |
| No. of Derogation requests | Equipment Name and Model | TAG / Facility No. | NOx Concentration (mg/Nm3) limit |
| 1. |  |  |  |
| 2. |  |  |  |
| 3. |  |  |  |
| 4. |  |  |  |

## Checklist Information

You must provide the following information to justify and support the derogation request:

Cost Benefit Analysis Tool[[1]](#footnote-2)

BAT Assessment

Supporting Qualitative Information[[2]](#footnote-3)

Please provide a reference list and summary for all supplementary/supporting information submitted:

|  |
| --- |
|  |

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1. It is acceptable to provide one cost benefit analysis per asset and supporting information where the options appraised are the same for each of the individual OCGT [↑](#footnote-ref-2)
2. Is expected to support the derogation request and CBA information. [↑](#footnote-ref-3)