THE OFFSHORE COMBUSTION INSTALLATIONS (POLLUTION PREVENTION AND CONTROL) REGULATIONS 2013 (as amended)

PETS Changes

Further to the Department’s previous communication of 10 July 2020 and in preparation to implement the Large Combustion Plant Best available techniques Reference (LCP BREF) and the BAT conclusions, changes have been made to the PETS PPC SAT to allow for the submission of derogation¹ requests to be made through the PETS system.

PPC SAT change:

An additional question asking whether the applicant is seeking a derogation from Best Available Technique Associated Emission Levels (BAT AEL) has been added to a new section entitled “Large Combustion Plant (LCP) Derogation Assessment”, and is located below the “Best Available Techniques (BAT) Assessment” section. Details of the changes are shown in Annex I.

The change will be released on the live system on 28th June 2021. Following the release,

- When a new variation to an existing PPC Permit is initiated, the applicant must answer the additional question. Applicants will only be required to select ‘yes’ should the variation relate to the submission of a derogation request.

- For new PPC permit applications, the additional question will be available as with the other questions.

- For existing variations in the system, the change to the PPC SAT will not be available and remain unaffected.

¹ Derogation from Nitrogen Oxides Emission Limit Value under Article 15(4) of Industrial Emissions Directive (2010/75/EU)
Annex I

Existing BAT Assessment Section:

Best Available Technique (BAT) Assessment

Please provide a BAT assessment for the combustion installation equipment on the offshore installation (platform) that is the subject of the permit application and the combustion equipment management regime, for all permit applications, permit variations, and/or substantial change assessments. For new combustion installations, or new items of equipment, the assessment should include details of the option selection process, to demonstrate that the proposed equipment and its management regime represent BAT. For existing combustion installations, the assessment need only briefly address the nature of the combustion installation equipment, but should demonstrate that the management regime represents BAT. Where the existing combustion installation equipment cannot meet strict Emission Limit Values (ELVs), the assessment must also include details of the geographical location, environmental conditions and technical characteristics of the combustion installation equipment to justify the application of less stringent control measures (e.g. annual emission loads). In all cases, the assessment should address energy efficiency, and include details of any relevant energy audit and cost benefit studies undertaken in relation to current or proposed energy efficiency improvement or emissions reduction strategies, both at the offshore installation (platform) level and for individual items of combustion installation equipment. Where independent energy assessments have been undertaken, copies of relevant reports that support the BAT assessment should also be provided. Where energy assessments are repeated, or new studies undertaken, copies of the new reports should be provided and the BAT assessment amended accordingly, and the new information submitted as an application for a permit variation.

Updated BAT Assessment Section:

Best Available Technique (BAT) Assessment

Please provide a BAT assessment for the combustion installation equipment on the offshore installation (platform) that is the subject of the permit application and the combustion equipment management regime, for all permit applications, permit variations, and/or substantial change assessments.

For new combustion installations, or new items of equipment, the assessment should include details of the option selection process, to demonstrate that the proposed equipment and its management regime represent BAT.

For existing combustion installations, the assessment need only briefly address the nature of the combustion installation equipment, but should demonstrate that the management regime represents BAT. Where the existing combustion installation equipment cannot meet strict Emission Limit Values (ELVs), the assessment must also include details of the geographical location, environmental conditions and technical characteristics of the combustion installation equipment to justify the application of less stringent control measures (e.g. annual emission loads).

In all cases, the assessment should address energy efficiency, and include details of any relevant energy audit and cost benefit studies undertaken in relation to current or proposed energy efficiency improvement or emissions reduction strategies, both at the offshore installation (platform) level and for individual items of combustion installation equipment. Where independent energy assessments have been undertaken, copies of relevant reports that support the BAT assessment should also be provided. Where energy assessments are repeated, or new studies undertaken, copies of the new reports should be provided and the BAT assessment amended accordingly, and the new information submitted as an application for a permit variation.

Please note - The uploaded documents for existing applications will remain unaffected.
Additional derogation question:

**Best Available Technique (BAT) Assessment**

Please provide a BAT assessment for the combustion installation equipment on the offshore installation (platform) that is the subject of the permit application and the combustion equipment management regime, for all permit applications, permit variations and/or substantial change assessments.

For new combustion installations, or new items of equipment, the assessment should include details of the option selection process, to demonstrate that the proposed equipment and its management regime represent BAT.

For existing combustion installations, the assessment need only briefly address the nature of the combustion installation equipment, but should demonstrate that the management regime represents BAT. Where the existing combustion installation equipment cannot meet strict Emission Limit Values (ELVs), the assessment must also include details of the geographical location, environmental conditions and technical characteristics of the combustion installation equipment to justify the application of less stringent control measures (e.g. annual emission limits).

In all cases, the assessment should address energy efficiency, and include details of any relevant energy audit and cost benefit studies undertaken in relation to current or proposed energy efficiency improvement or emissions reduction strategies, both at the offshore installation (platform) level and for individual items of combustion installation equipment. Where independent energy assessments have been undertaken, copies of relevant reports that support the BAT assessment should also be provided. Where energy assessments are repeated, or new studies undertaken, copies of the new reports should be submitted and the BAT assessment amended accordingly, and the new information submitted as an application for a permit variation.

**Large Combustion Plant (LCP) Derogation Assessment**

*Please confirm if LCP derogation from BAT-AEL is the subject of the permit application?*
If ‘no’ is selected, no further action will be required,
If ‘yes’ is selected, supporting documents will need to be uploaded. The section allows for multiple files to be uploaded.