

Frequently Asked Questions (FAQs) - Medium Combustion Plant

As defined in the Offshore Combustion Installations (Pollution Prevention and Control) Regulations 2013 (As amended)

Last Updated 10/Oct/2023

What is a Large Combustion Installation (LCI)?

An offshore installation with combustion plant with aggregated rated thermal input which is equal to or greater than 50 megawatts (MW).

Definition:

In accordance with the regulations a Large Combustion Installation means: -

- (a) a relevant platform; or
- (b) a complex of relevant platforms permanently inter-connected by bridges, equipped with an offshore combustion plant which on its own or aggregated together with any other combustion plant on the same platform or complex has a rated thermal input which is equal to or greater than 50 megawatts.

What is a Medium Combustion Installation (MCI)?

An offshore installation with combustion plant with aggregated rated thermal input which is less than 50 megawatts (MW), and which is equipped with an offshore combustion plant that has a rated thermal input which is equal to or greater than 1 megawatt and less than 50 megawatts;

Definition:

In accordance with the regulations a Medium Combustion Installation means:-

- (a) a relevant platform; or
- (b) a complex of relevant platforms permanently inter-connected by bridges, which is not a large combustion installation and which is equipped with an offshore combustion plant that has a rated thermal input which is equal to or greater than 1 megawatt and less than 50 megawatts.

What is a Medium Combustion Plant (MCP)?

Definition:

"medium combustion plant" means, subject to regulation 2A, an offshore combustion plant with a rated thermal input which is equal to or greater than 1 megawatt and less than 50 megawatts, but does not include—

- (a) gas turbines, gas engines and diesel engines; or
- (b) combustion plant in which gaseous products of combustion are used for the direct heating, drying or any other treatment of objects or materials;

Are Inert Gas Generators in scope of MCP?

No, Inert Gas Generators are out of scope; where these are used offshore to ensure the safe low oxygen atmosphere in the cargo tanks and pipes of FPSO and FSO vessels to minimise the risk of explosion.

Are dual fuel engines in scope of MCP?

Yes, dual fuel engines are in scope of MCP.

What is Rated Thermal Input?

“rated thermal input”* means the rate at which fuel (**kg/s or m3/s**) can be burned at the maximum continuous rating of the appliance multiplied by the net calorific value (**MJ/kg or MJ/m3**) of the fuel and expressed as megawatts thermal (**MJ/s = MW**).

*Rated thermal input refers to the energy contained in the fuel input, not to be confused with thermal output or power output.

What is meant by ‘Put into operation’?

‘Put into operation’ means the date the fuel is first combusted in the MCP. This includes when the plant is commissioned on site but not conformity testing at the place of manufacture.

You must have proof of the date the MCP was put into operation. The record must be traceable to the combustion unit e.g. through plant maintenance records.

When is medium combustion plant (MCP) classed as ‘new’ or ‘existing’?

The definition of ‘new’ and ‘existing’ MCP is directly related to the date at which the MCP is put into operation.

For offshore combustion installations where an MCP on a LCI or MCI was first put into operation before 20th December 2018, or for which a permit was granted before 19 December 2017 and the plant was put into operation no later than 20th December 2018, then the MCP is classed as ‘**existing** MCP’ in the offshore regulations. Otherwise, the MCP is considered a ‘**new** MCP’ – where it was first put into operation on or after 20th December 2018.

- ‘existing MCP’ with rated thermal input greater than 5 megawatts is required to be covered by conditions in a PPC permit by 1/1/2024. Where ELV are set in the permit for existing MCP, these must be complied with from 1/1/2025.
- ‘existing MCP’ with rated thermal equal to or greater than 1 megawatt of not more than 5 megawatts is required to be covered by conditions in a PPC permit by 1/1/2029. Where ELV are set in the permit for existing MCP, these must be complied with from 1/1/2030.

- All 'new MCP' are required to be covered by conditions in a PPC permit before they are put into operation. Where ELVs are set in the permit for new MCP, these must be complied with from the date the MCP is put into operation.

What should I do if I have an 'existing' MCP?

Operators with an existing PPC permit (LCI) must vary the permit for existing MCP with a rated thermal input greater than 5MW.

Operators with an MCI must apply for a permit for existing MCP with a rated thermal input greater than 5MW.

To allow sufficient time for the determination of the permit variation or application by OPRED, before the relevant date, operators should submit the application to the Department by 20th October 2023.

What should I do if I have a 'new' MCP?

New MCP is combustion plant that has a rated thermal input which is equal to or greater than 1 megawatt and less than 50 megawatts put into operation on or after 20th December 2018. You must have had a PPC permit in place by 20th December 2018 or before the date at which new MCP is put into operation, whichever is the later.

If MCP is reinstated to the permit after having been taken out for service – is it 'existing' or 'new' plant?

To determine if reinstated combustion plant should be treated as 'existing' plant you will need to provide evidence that the date it was first '**put into operation**' was no later than 20th December 2018. You must also provide evidence of the specification for the reinstated combustion plant, including highlighting any repair or modification work carried out whilst it was out of service.

What are the emissions monitoring requirements for Offshore MCP?

Please refer to the Department's Offshore Emissions Monitoring Guidance [PPC Offshore Emissions Monitoring Guidance Rev4](#)

When do I need to apply for a permit or to vary a permit?

In accordance with the Department's communication 15th September 2023, we expect to receive applications **for existing MCP with rated thermal input greater than 5MW** by 20th October 2023 in order to allow sufficient time to carry out a determination.

The relevant date for application of the regulations to existing MCP with rated thermal input greater than 5MW requires that these are permitted by 1st January 2024.

The relevant date for application of the regulations to **existing** MCP with rated thermal input of not more than 5MW requires that these are permitted by 1st January 2029.

To have received an approved permit for MCP by the relevant date, the operator of the offshore combustion installation must apply to the Department through the UK Energy Portal Environmental Tracking System (PETS).

What if I am an LCI with no MCP?

Your PPC permit does not need to be varied to meet the requirements at the 'relevant dates'.

The first time you vary your PPC permit for other reasons you will need to populate the relevant LCI fields in the portal application. For LCI where any item of plant is not MCP you will only be required to indicate where it is 'LCP' or 'Other' plant.

Emissions Limit Values (ELVs)?

The regulations require the ELVs your MCP must comply with to be set in accordance with the [Retained EU Law eudr/2015/2193](#) Annex 2 tables.

From 20th December 2018, emissions into the air of sulphur dioxide, NOx and dust from **new** MCP must not exceed the emission limit values set out in Part 2 of Annex 2.

From 1st January 2025, emissions into the air of sulphur dioxide, NOx and dust from an **existing** medium combustion plant with a rated thermal input greater than 5 megawatts must not exceed the emission limit values set out in Tables 2 and 3 of Part 1 of Annex 2.

ELV Exemptions?

Limited operating hours – potential exemptions from meeting ELVs are defined in regulation 11C for existing MCP and in regulation 11D for new MCP:

An existing MCP operating for no more than 500 operating hours per year, as a rolling average over a period of five years, is not required to comply with the emission limit values set out in Part 1 of Annex 2 during that period of five years, provided that the operator has signed a declaration in accordance with Annex 1 before the start of that period of five years.

A new MCP which operates for no more than 500 operating hours per year, as a rolling average over a period of three years, is not required to comply with the emission limit values set out in Part 2 of Annex 2 during that period of three years, provided that the operator has signed a declaration in accordance with Annex 1 before the start of that period of three years.

Note that an existing MCP with a limited hours exemption from having to comply with ELVs will still require to be permitted with conditions; it is not exempt from needing a permit. The permit will include a condition to record accurate operating hours as an audit trail to support compliance with the operating hours exemption.