


*Ana Bolger*

21<sup>st</sup> December 2015.

 <p><b>epa</b> Environmental Protection Agency <i>An Ghníomhaireacht um Chaomhnú Comhshaoil</i></p>	<b>OFFICE OF CLIMATE, LICENSING &amp; RESOURCE USE</b>
<b>INSPECTOR'S REPORT ON A TECHNICAL AMENDMENT</b>	
<b>TO:</b>	Dara Lynott – OCLR Director
<b>C.C.</b>	Frank Clinton; Sean O'Donoghue
<b>FROM:</b>	Patrick Geoghegan
<b>DATE:</b>	21 <sup>st</sup> December 2015
<b>RE:</b>	Technical Amendments to IED licences to comply with EU (Large Combustion Plant) Regulations 2012 (S.I. No 566 of 2012)

### **Background:**

The above regulations give effect to Chapter III and Annex V of the Industrial Emissions Directive (2010/75/EU) and apply to new and existing combustion plants with a total rated thermal input of which is equal to or greater than 50MW, irrespective of the type of fuel used.

The Agency is obliged under Article 82(3) of the IED, from 1<sup>st</sup> January 2016, to ensure that relevant licences comply with Chapter III and Annex V of the industrial emissions directive.

An Agency review of all power and non-power generation large combustion plant licences indicates that Chapter III requirements need to be incorporated into 17 existing licences. Table 2 of this Memo contains a list of these installations. Licenses or licence reviews which have been issued since the coming into force of the LCP Regulations 2012 which transposed Chapter III and Annex V of the IED, have fully incorporated the requirements of the regulations.

The overall requirement is to ensure emissions do not exceed those set out in the above Regulations and is therefore a tightening of environmental standards over existing licence requirements for qualifying combustion plants. These changes will not involve any developments that require planning permission and will not allow any increased emissions or new emission points, the effect of the changes will be to reduce actual emissions to air from the installation and will Section 83(5) of the EPA Acts.

The specific changes to the licences, in order to fulfil the requirements, are set out in Table 1 of this report.

There is no requirement to screen for Appropriate Assessment when amending a licence to ensure compliance with the LCP Regulations 2012 (S.I. No. 566 of 2012).

### **Engagement with Industry:**

The Agency have engaged extensively with the large combustion plant sector, the representative body, the Electricity Association of Ireland, and licensees including ESB and Bord na Mona throughout 2015, through face-to face meetings, electronic communications, etc. This active engagement has been successful in determining and agreeing IED compliance routes on IED options e.g. Transitional National Plan (TNP), Limited Life-time derogation (LLD), Emergency use plant, or IED ELV compliance. Discussions were also advanced with relevant licensed facilities around the mechanism of ensuring compliance with the regulations by way of technical amendments.

The technical amendments, for qualifying plants, set the mass emission ceilings in accordance with the TNP approved by the Commission, with agreed targets for further reductions for certain pollutants.

Confirmation of committing to IED ELV's, Limited lifetime, Emergency use or the TNP route has been received from the relevant licensees. These options have been used in the development of the technical amendments attached to this Memo.

### **Changes required through Technical Amendments:**

The changes to existing licences required in order to ensure conformance with Chapter III of the IED and LCP Regulations 2012 are dependent on the agreed IED compliance option and the type (and thermal rating) of plant. For example, plants opting for the TNP option will require emission ceilings (tonnes) in line with the TNP for Ireland under the Commission Decision of 9<sup>th</sup> December 2013. Such plants may also have particular (auxiliary) units on the licensed site which TNP does not apply, such as peaking gas-plants, for example in the case of Edenderry Power so another compliance option, in this case emission limit values, in line with the LCP Regulations 2012 will apply to the specific pollutants (NO<sub>x</sub>, SO<sub>2</sub>, Particulates) contained within the existing licence for such peaking plants.

Other plants opting for Limited Lifetime (LLT), are exempt from compliance with the emission limit values outlined in the LCP Regulations 2012 subject to meeting certain conditions regarding operating hours. These conditions form part of the relevant technical amendments accompanying this Memo.

Table 1 below categorises the licensed LCP plants by fuel type used and summarises the specific changes necessary in order to comply with Chapter III of the IED and LCP Regulations 2012.

Table 1:

<b>Plant and Fuel type</b>	<b>Plant Name</b>	<b>Compliance Option agreed</b>	<b>Changes required through technical amendment</b>
Thermal (Coal/HFO/Peat/Biomass)	ESB Moneypoint (Units 1,2,3)	TNP	Mass emissions to be amended to TNP limits, with further targeted reductions in sulphur dioxide and dust mass emissions as part of objectives and targets. Amend Interpretation clause Emission ceilings to be included in licence for 2016-2012. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 Require quality assurance condition.
	Edenderry Power Ltd – Peat/Biomass Unit. <b>(excludes gas fired peaking plants)</b>	TNP	Mass emissions to be amended to TNP limits, with further targeted reductions in NO <sub>x</sub> SO <sub>2</sub> and dust mass emissions as part of objectives and targets. Amend Interpretation clause Emission ceilings to be included in licence for 2016-2012. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 (Quality assurance already required in licence).
	Tarbert Units 1,2,3,4	Limited Lifetime	Exempt from ELV's and revised emission monitoring under LCP Regulations 2012. Require record of operating hours. Retain existing licence ELV's. Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 Require quality assurance condition.
	Great Island (Wexford) <b>(excluding gas</b>	Not applicable	Decommissioned in 2015.

	<b>turbine)</b>		
	ESB Aghada Unit 1	Limited Life-time	As it will change from TNP unit plant to a LLT unit plant from 1/1/2016 plant, emission ceilings in licence will be removed. Require record of operating hours and restrict operational hours to 17,500 up to 31/12/2023. Retain existing licence ELV's. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 Require quality assurance condition (for plant).
	West Offaly Power	IED compliance	Maintain/tighten ELV's for NO <sub>x</sub> SO <sub>2</sub> and Particulates, in line with LCP Regulations 2012; Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 Require quality assurance condition.
	Lough Ree Power	IED compliance	Maintain/tighten ELV's for NO <sub>x</sub> SO <sub>2</sub> and Particulates, in line with LCP Regulations 2012; Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 Require quality assurance condition.
Gas Turbines (gas; distillate)	Edenderry Peaking Plant	IED compliance	Tighten carbon monoxide monitoring and ELV in line with LCP Regulations 2012 for gas turbine plants. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012
	ESB Aghada Unit 2	IED compliance	Maintain existing licence ELV's for gas-firing. Reduce NO <sub>x</sub> ELV for distillate firing. Tighten carbon monoxide monitoring and ELV in line with LCP Regulations. Amend Interpretation clause. Require start up shut down

			condition in accordance with CID of 7 <sup>th</sup> May 2012 (for all units) Require quality assurance condition (for plant).
	ESB Aghada CT 11	Limited Life-time	As it will change from a TNP unit plant, to a LLT unit plant, emission ceilings in the licence will be removed. Require record of operating hours and restrict operational hours to 17,500 up to 31/12/2023. Retain existing licence ELV's. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 (for all units) Require quality assurance condition (for plant).
	ESB Aghada CT12	TNP	Mass emissions to be amended to TNP limits and following exit of TNP in 2020 apply IED ELV's for NO <sub>x</sub> SO <sub>2</sub> and Particulates.  Tighten carbon monoxide monitoring and ELV in line with LCP Regulations 2012. Revise Interpretation clause for confidence intervals. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 (for all units) Require quality assurance condition (for plant)
	ESB Aghada CT 14	TNP	Mass emissions to be amended to TNP limits and following exit of TNP in 2020 apply IED ELV's for NO <sub>x</sub> SO <sub>2</sub> and Particulates.  Tighten carbon monoxide monitoring and ELV in line with LCP Regulations 2012. Revise Interpretation clause for confidence intervals. Require start up shut down condition in accordance with CID of 7 <sup>th</sup> May 2012 (for all units). Require quality assurance condition (for plant).
	SSE Great island (peaking plant)	IED Compliance	Maintain existing licence ELV's for gas-firing. Reduce NOx ELV for distillate firing.

			<p>Tighten ELV for carbon monoxide (monitoring already in place). Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012.</p> <p>Require quality assurance condition.</p>
	SSE Rhode	Emergency use plant only	<p>Exempt from ELV's and revised emission monitoring under LCP Regulations 2012. Require record of operating hours. Retain existing licence ELV's. Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012.</p>
	SSE Tawnaghmore	Emergency use plant only	<p>Exempt from ELV's and revised emission monitoring under LCP Regulations 2012. Require record of operating hours. Retain existing licence ELV's. Require quality assurance condition. Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012.</p>
	Huntstown Unit 1	IED Compliance	<p>Maintain existing licence ELV for gas-firing. Reduce NOx ELV for distillate firing. Tighten ELV and monitoring for carbon monoxide. Restrict duration of unabated operation (not in existing licence). Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012. Require quality assurance condition.</p>
	Viridian	IED Compliance	<p>Maintain existing licence ELV's for gas-firing.</p>

			<p>Reduce NOx ELV for distillate firing. Tighten ELV for carbon monoxide (monitoring already in place). Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012. Require quality assurance condition.</p>
	Bord Gais Eireann (Whitegate)	IED Compliance	<p>Maintain existing licence ELV's for gas-firing. Reduce NOx ELV for distillate firing. Tighten ELV and monitoring for carbon monoxide. Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012. Require quality assurance condition.</p>
	ESB Poolbeg	IED compliance	<p>Reduce ELV for NOx, when firing on natural gas, in line with LCP Regulations 2012 Tighten ELV and monitoring for carbon monoxide. Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012. Require quality assurance condition.</p>
	ESB Northwall	Limited Life-time	<p>Require record of operating hours and restrict operational hours to 17,500 up to 31/12/2023. Retain existing licence ELV's. Amend Interpretation clause. Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012. Require quality assurance condition.</p>
	ESB Marina	Limited Life-time	<p>As it will change from a TNP plant, to a LLT plant, emission ceilings in the licence will be removed.</p>

			<p>Require record of operating hours and restrict operational hours to 17,500 up to 31/12/2023.</p> <p>Retain existing licence ELV's.</p> <p>Amend Interpretation clause.</p> <p>Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012.</p> <p>Require quality assurance condition.</p>
	ESB Synergen	IED compliance	<p>Maintain existing licence ELV's for gas-firing</p> <p>Reduce NOx ELV for distillate firing</p> <p>Tighten ELV and monitoring for carbon monoxide</p> <p>Restrict duration of unabated operation (not in existing licence)</p> <p>Amend Interpretation clause.</p> <p>Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012.</p> <p>Require quality assurance condition.</p>
	Tynagh	IED compliance	<p>Maintain existing licence ELV's for gas-firing</p> <p>Reduce NOx ELV for distillate firing</p> <p>Tighten ELV for carbon monoxide (monitoring already required)</p> <p>Amend Interpretation clause.</p> <p>Require start up shut down condition in accordance with CID of 7<sup>th</sup> May 2012</p> <p>Require quality assurance condition.</p>



Table 2: List of installations requiring technical amendments:

<b>Reg No</b>	<b>Licensee</b>	<b>Address of Installation</b>
P0482-04	Edenderry Power Limited	Ballykilleen, Edenderry Co Offaly
P0483-04	Huntstown	Huntstown, Finglas Dublin 11
P0486-02	ESB Dublin Bay Power Synergen	Pigeon House Road, Ringsend Dublin 4
P0561-05	ESB Aghada	Whitegate, Midleton Co Cork
P0566-02	SSE Tawnaghmore	Tawnaghmore, Killala, Co Mayo
P0577-03	ESB Poolbeg	Pigeon House Road, Ringsend Dublin 4
P0578-03	ESB Marina	Centre Park Road, Cork
P0579-03	ESB Northwall	Alexandra Road, Dublin 1
P0605-03	ESB Moneypoint	Killimer, Kilrush Co Clare
P0606-03	SSE Great Island	Campile New Ross, Co Wexford
P0607-02	SSE Tarbert	Tarbert Listowel, Co Kerry
P0610-02	ESB Lough Ree	Lanesborough Co Longford
P0611-02	ESB West Offaly	Shannonbridge, Co Offaly
P0694-01	SSE Rhode	Coolcor, Rhode Co Offaly
P0700-02	Tynagh	Derryfrench, Loughrea, Co Galway
P0777-02	Viridian	Pigeon House Road, Ringsend Dublin 4
P0830-02	BGE Whitegate	White gate,(Corkbeg and Glanagow Townlands, Co Cork

**Recommendation:**

I recommend that the Industrial Emission Licence amendments attached for the above licences are issued.




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Patrick Geoghegan  
Environmental Licensing Programme

