

Technical Amendment – Jan 2020

Schedule B.1.2 of the licence specifies the emission limit values (ELV) for the exhaust gasses from the on-site CHP Plant Gas Engines.

Condition 4.2 stipulates that the concentration and volume flow limits for emissions to atmosphere specified in the licence shall be achieved without the introduction of dilution air and shall be based on gas volumes under standard conditions of

4.2.2 From combustion sources: Temperature 273K, Pressure 101.3 kPa, dry gas; 3% oxygen for liquid and gas fuels, 6% oxygen for solid fuels.

The 3% oxygen value for gas fuels is not consistent the requirements of the Industrial Emissions Directive (2010/75/EU) (the Directive).

Article 30 (3) of the Directive requires that all permits for installations containing combustion plants, other than those for which were in operation before 7th January 2014, to include conditions ensuring that emissions into the air from those plants do not exceed the emission limit values set out in Part 2 of Annex V of the Directive.

Section 1 of Part 2 of Annex 5 specifies that *'All emission limit values shall be calculated at a temperature of 273,15 K, a pressure of 101,3 kPa and after correction for the water vapour content of the waste gases and at a standardised O₂ content of 6 % for solid fuels, 3 % for combustion plants other than gas turbines and gas engines using liquid and gaseous fuels and 15 % for gas turbines and gas engines.*

Ormonde Organics considers that the reference to 3% oxygen for gas fuels in Condition 4.2.2 as applied to the gas engines to be a clerical error and requests the wording of the Condition be altered to bring it into conformance with the requirements of Part 2 of Annex V of the Directive i.e. all emission limit values shall be calculated at a temperature of 273.15 K, a pressure of 101.3kPa and after correction for the waste vapour content of the waste gasses at a standardised O₂ content of 15%.