

Medium combustion plant directive (MCPD) implications for chemical sites

The Medium Combustion Plant Directive (MCPD) forms part of the EU's Clean Air Policy and fills a regulatory gap between small and large combustion plant, targeting emissions from combustion plants of between 1 and 50MWth input.

The Environmental Permitting Regulations (England and Wales) were amended in 2018 to implement the requirements of the MCPD. When transposing the requirements of the MCPD into the EPR, Defra introduced additional controls for Specified Generators (SGs). In short, the amendments require operators to obtain and comply with the conditions of an environmental permit if they operate a MCP or Specified Generator, with a small number of exemptions. Both the MCP and SG controls are implemented by the EPR.

'Medium Combustion Plant' (MCPs) are defined as combustion plant with a thermal input rating between 1MWth and 50MWth.

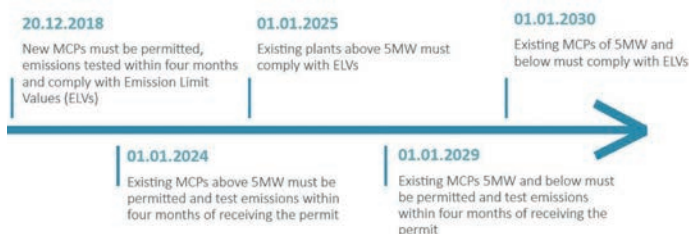
'Specified Generators' (SGs) are those MCPs that generate electricity for >50hrs per annum (incl. testing) or export electricity to the grid.

Key dates

MCPD controls apply to all MCP regardless of the fuel type used, which have a rated thermal input of each unit between 1MWth and 50MWth. SG controls, unless excluded, apply to generators with a rated thermal input between 1MWth and 50MWth. You may find that your plant must comply under both the MCPD and SG requirements. If this is the case, then your plant must be permitted by the earliest relevant permitting date. There are several factors which vary the date which you are required to have your MCPD or SG permit in place.

Key dates for MCPs

Key dates for MCPs are as follows:

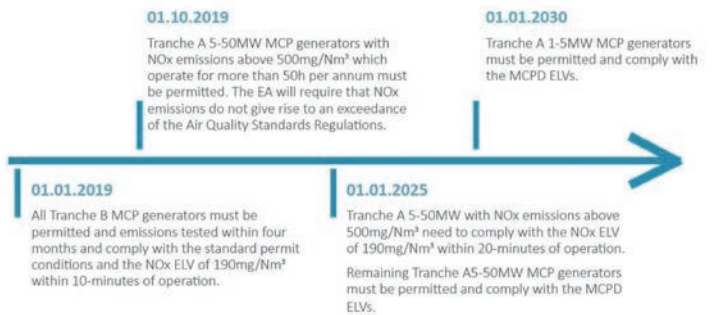


Where:

- 'New' means any plant commencing operation after 20th December 2018; and
- 'Existing' means any plant which commenced operation before 20th December 2018.

Key dates for SGs

Key date for SGs are as follows:



Tranche A generators are those which came into operation before 1st December 2016, or benefit from capacity agreements from the 2014 and 2015 capacity market auctions or generators >1MWth with capacity agreements from the 2016 capacity market auction.

Relevant exemptions

There are several exemptions relevant to the chemical industries including for:

- Thermal oxidiser
- Facilities for the regeneration of catalytic cracking catalysts
- Facilities for the conversion of hydrogen sulphide into sulphur
- Reactors used in the chemical industry
- Cowpers

Should I have a Permit?

In line with the MCPD and SG requirements, you should already have obtained a permit for your site if you are;

- Operating a new MCP;
- Operating a Tranche B specified generator; or
- Operating a Tranche A SG between 5-50MW and have NOx emissions above 500mg/Nm³ operating at more than 50hr per annum.

If you wish to commission a new MCP or enter into a new capacity market agreement which causes your plant to become a Tranche B SG, you are required to obtain a permit before the commissioning date.

In line with the EPR, the next set of permitting dates are for;

- Existing MCPs above 5MW, which are required to be permitted by 01.01.2024; and
- Remaining Tranche A SG between 5MWth and 50MWth, which are required to be permitted by 01.01.2025.

**Paul Wright, Technical Discipline Manager & Technical Director, Environment Management, Permitting & Compliance - pwright@slrconsulting.com
www.slrconsulting.com**