
EUROMOT POSITION

20 May 2015



EU LCP BREF – General environmental and combustion performance BAT 6 ter.

With a view to the forthcoming discussion at the final TWG meeting in Seville in June 2015, the member companies of EUROMOT want to raise the following concerns on the proposed Chapter 10 "Best Available Techniques (BAT) Conclusions for Large Combustion Plants":¹

10.1.3. General environmental and combustion performance BAT 6 ter.

Current text of the LCP BREF BP Document

BAT 6 ter. BAT is to monitor emissions to air and/or to water during OTNOC, providing that the monitoring system is not involved in the occurrence of the OTNOC.

Proposal for modification

The text should be deleted.

Justification

Emissions in power plants are today measured at steady state conditions and to the best of our knowledge there are no available and repeatable test procedures for measuring the emission during the transient load ramp up to the set value after the engine has been synchronized and is starting to feed electricity to the grid, ditto for the unloading (shut down) sequence. The required start up times will vary significantly depending on the engine type,

¹ Document TL/JFF/EIPPCB/Revised LCP_Draft of 1 April 2015

fuel, abatement technique used (e.g. catalyst type), ambient conditions, application and rated load. To be noted is that emission measurements are to be based upon a validated, accurate, repeatable and cost-effective reference test method. When the set loading point is reached the engine operation is still to be stabilized before emission measurements are conducted.

We are not aware of any reference power plant where the BAT 6 ter has been applied.

The Commission Implementation Decision 2012/249/EU² applies to combustion plants covered by chapter III of Directive 2010/75/EU. This paper requires discrete processes and operational parameters or equivalent processes/operational parameters associated with start-up and shut-down periods to be used for determining start-up and shut-down periods. In view of Directive 2010/75/EU to prevent emissions, those periods shall be as short as possible, i.e. procedures are already in place for shortening start-up/shut-down periods.

We remain available for further clarifications and in-depth discussions of our positions.

EUROMOT – 2015-05-20

For more information please contact:

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EU Transparency Register ID number: 6284937371-73

² Commission Implementation Decision 2012/249/EU at <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:123:0044:0047:en:PDF>

EUROMOT is the European Association of Internal Combustion Engine Manufacturers. It is committed to promoting the central role of the IC engine in modern society, reflects the importance of advanced technologies to sustain economic growth without endangering the global environment and communicates the assets of IC engine power to regulators worldwide. For more than 20 years we have been supporting our members - the leading manufacturers of internal combustion engines in Europe, USA and Japan - by providing expertise and up-to-date information and by campaigning on their behalf for internationally aligned legislation. The EUROMOT member companies employ all over the world about 200,000 highly skilled and motivated men and women. The European market turnover for the business represented exceeds 25 bn euros.

Our **EU Transparency Register** identification number is **6284937371-73**.

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