

IED "Large Combustion Plants" BREF

The European Turbine Network, in collaboration with its members across the whole value chain of the gas turbine industry has spent considerable time reviewing the BREF document. We do appreciate the substantial efforts by the Seville team in compiling a very comprehensive document covering the wide range of technologies in our complex industry.

However, our review has highlighted a number of very important concerns which we believe must be addressed during the consultation process. We have loaded the details of these concerns into the BATIS system, but due to the serious impact the suggested BREF proposal would have on our industry, we have also summarised our overall main concerns below:

1. The Gas Turbine Industry has worked hard to submit information to the BREF review process, putting forward reasoned arguments. This has been via national bodies and trade groups, such as ours. Much of this seems to have been ignored in the drafting of this revised document.
2. It is not clear how the Seville IPPC team have analysed the data and reached their conclusions on emissions and performance levels. Submitted data has been screened out, but as TWG members we do not know on what grounds and also we believe there are further flaws in the data analysis. Therefore we believe the AELs proposed are not representative of the input data.
3. Sustaining the AEL performance levels in the BAT Conclusions will either not be viable or will drive in significant capital cost increases relative to the emissions benefits. Further items proposed in this draft will also entail unnecessary operational costs. The Cost and Complexity of implementation is further exacerbated as the performance, operational and reporting requirements are heavily misaligned with the requirements of the IED.
4. There is a lack of consideration of operating modes (base load, mid merit, frequent start up and shut down etc.), and hence the ability to achieve or afford the proposed performance. The BREF should be consistent with the IED with respect to AEL levels and maintain flexibility by permitting authorities in their application, especially around plant operating in a transitional national plan.
5. As proposed it is likely that the conclusions in this document will severely compromise the ability of many gas turbine based power plant to offer the start up and shut down flexibility required to support the deployment of intermittent renewable generation.
6. The period for comments is too short, and we believe a second draft should be incorporated into the document development process.
