



## Compilation of common questions on Large Combustion Plants (LCP) reporting

### How do I report total rated thermal input when plants contain units below the 15-MW thermal threshold set by Article 29, Industrial Emissions Directive (IED)?

Reporters are expected to submit to the LCP inventory the entire REAL total thermal input and the REAL energy input and emissions. In the remarks (comments) field for the relevant plant, reporters are encouraged to include a reference to the unit(s) that are part of the plant and their individual capacities, including the ones that fall below that 15-MWth threshold.

Article 72(3)(a) of the Industrial Emissions Directive requires reporting of the “total rated thermal input (MW) of the combustion plant”. Article 29 of the same Directive provides aggregation rules to calculate this metric. It is important to clarify what requirements apply to a given plant.

It is necessary to distinguish two concepts:

- *Real total rated thermal input* – the sum of the nominal capacity of all combustion units in the plant that are actually operated, i.e including those below 15 MWth;
- Total rated thermal input for legal purposes (hereafter referred to as *capacity for legal purposes*) – the capacity calculated in accordance with Article 29 that applies for triggering the application of the provisions of Chapter III and Annex V of the IED.

The aggregation rule (Article 29) included in Chapter III of the IED is explained as follows:

- Plants below 15 MWth shall not be included for the sake of calculating the *capacity for legal purposes*;
- The nominal capacity of all plants above 15 MWth, which discharge waste gases through a common stack, shall be added to calculate the *capacity for legal purposes*. This is the capacity that determines the applicable emission limit values;
- For plants first permitted after 1 July 1987, the same rule applies also in case of a "virtual" common stack. A "virtual" common stack means that there doesn't need to be a real common stack, it's sufficient if the various plants could have been built in such way so as to use a common stack for exhaust gases;
- Plants permitted before 1 July 1987, the waste gases of which are discharged through separate stacks, and to which new combustion units are added after 1 July 1987 (with a separate stack) do not count towards calculating the 'virtual common stack' of the extended plant. The new combustion units will only become a large combustion plant in the sense of Chapter III IED once the units added after 1 July 1987 form a large combustion plant by virtue of the rules on common or virtual common stack.



If the resulting *capacity for legal purposes* is equal or greater than 50 MWth, then the relevant plant is within the scope of Chapter III, IED and the ELVs will apply at plant level, i.e. to all units composing the plant, including those below the 15 MWth threshold).

Once a plant is obliged to report under Article 72, i.e. where the *capacity for legal purposes* is equal or greater than 50 MWth, both the capacity and the emissions to be reported are those that correspond to the real-life situation, i.e. the *real total rated thermal input*. This includes units below 15 MWth and total emissions including those stemming from units below 15 MWth.

**In other words, reporters must submit to the LCP inventory the entire REAL total thermal input and the REAL energy input and emissions.**

Reporters must report the *real total thermal input*, including **ALL units** that discharge gases through the common stack, even if any of the plants are smaller than 15 MWth. In the remarks (comments) field for the relevant plant, reporters are encouraged to include a reference to the unit(s) that are part of the plant and their individual capacities, including the ones that fall below that 15-MWth threshold.

## How do I define the date of start of operation?

**Reporters are expected to consider the date, at stack level, where a given plant exceeds 50 MWth capacity for legal purposes.**

The date of the start of operation of the combustion plant counts from the date when the plant operates beyond 50 MWth for the first time, according to the aggregation rule, as explained above. In case of a **real** common stack, older units permitted before 1 July 1987 will count towards the calculation and the first date of operation will be easy to determine. In the case of a virtual common stack, only units added after 1 July 1987 will be taken into account and it will be the date when all units added after 1 July 1987 reach 50 MWth that will count as the date of the start of operation.

## How must operating hours be accounted for?

**Reporters are expected to submit operating hours at stack level.**

Operating hours are to be counted at the level of the common stack (virtual or not), just like all other reporting elements. This means that, whenever any of the units connected to the stack is operating, these hours are counted. If several units in the same LCP are operating at the same time, no double counting should be applied.

The maximum acceptable hours at stack level are therefore the number of hours of a year (i.e. 8760 hours, with the exception of leap years where 8784 hours are accepted)

## Derogation on high sulphur solid fuels and rate of desulphurisation: How do I report in months where the derogation does not operate?

According to Article 31 on Desulphurisation rate, “For combustion plants firing indigenous solid fuel, which can not comply with the emission limit values for sulphur dioxide referred to in Article 30(2) and (3) due to the characteristics of this fuel, Member States may apply instead the minimum rates



of desulphurisation set out in Part 5 of Annex V, in accordance with the compliance rules set out in Part 6 of that Annex and with prior validation by the competent authority of the technical report referred to in Article 72(4)(a).”

In the case where such authorized LCP would not have used any indigenous solid fuel during at least an entire month, the reporter shall, in the boxes corresponding to this month:

- 1) Populate the desulphurisation rate as “0” (zero)
- 2) Populate the sulphur content as “0” (zero)
- 3) Fill out the “technical Justification” with “Derogation N/A”

**Figure 1: Example of a case where the derogation does not apply in January and February**

Desulphurisation Rate *	Sulphur Content *	Technical Justification *	Month *
0	0	Derogation N/A	JAN
0	0	Derogation N/A	FEB