# Effects of IPPC Permits on Ambient Air Quality

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Abstract—The aim of this paper is to give an assessment of environmental effects of IPPC permit conditions of installations that are in specific territory with high concentration of industrial activities

The IPPC permit is the permit that each operator should hold to operate the installation as stated by the directive 2010/75/UE on industrial emissions (integrated pollution prevention and control), known as IED (Industrial Emissions Directive).

The IPPC permit includes all the measures necessary to achieve a high level of protection of the environment as a whole, also defining the monitoring requirements as measurement methodology, frequency and evaluation procedure. The emissions monitoring of a specific plant may also give indications of the contribution of these emissions on the air quality of a definite area.

So, it is clear that the IPPC permits are important tools both to improve the environmental framework and to achieve the air quality standards, assisting to assess the possible industrial sources contributions to air pollution.

*Keywords*—IPPC, IED, emissions, permits, air quality, large combustion plants.

#### I. INTRODUCTION

THE European directive 2010/75/UE [1] on industrial emissions (integrated pollution prevention and control), known as IED (Industrial Emissions Directive), is the legislative instrument in force concerning IPPC (Integrated Pollution Prevention and Control). This directive recasts also the Directive 2008/1/EC [2], concerning IPPC, which codified the Directive 1996/61/EC [3].

It regulates the way to guarantee the prevention and reduction of pollution generated by the major industrial activities, ensuring the achievement of a high level of environmental protection as a whole. The innovative aspect introduced by IPPC legislation since 1996 is an integrated approach to analyze environmental problems originated from installations, not considering separately the individual contributions in the different environmental matrices, but looking at the whole environmental reference situation, to identify all contributions attributed to a specific plant and put in place the corrective actions to obtain a coordinated and complete protection of the environment surrounding the plant.

The categories of industrial activities falling in the IPPC regulation can be divided in six major groups: energy industries, production and processing of metals, mineral industry, chemical industry, waste management, other

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activities (like production of paper, tanning of hides and skins, disposal or recycling of animal carcases or animal waste etc.).

The IPPC Directive provides a specific permit for each installation.

According to Directive 2008/50/CE [4] on ambient air quality, which could lead to stricter permit condition, the operational conditions fixed in the IPPC permits are also based on the local plans and programmes, as the air quality plans.

The air quality plans can be an efficient tool to assess the possible contributions to pollutants from industrial sources and also to individuate the correct measures to achieve the related limit value or target value. In the same time, the issued IPPC permits might became a valid tool both to improve the environmental framework and to achieve the air quality standards.

This direct link between the air quality law and IPPC law is essential in the areas with a high industrial concentration, where the industrial contribution to the air quality is relevant.

#### II. IPPC ACTIVITIES IN ITALY

In Italy, the previous directive on Integrated Pollution Prevention and Control (IPPC) (Directive 1996/61/EC [3] as codified by Directive 2008/1/EC [2]) was transposed with Legislative Decree 59/2005 [5], recently recasted by Legislative Decree 46/2014 [6] that has transposed directive 2010/75/UE [1].

The Italian transposition of the IPPC regulations introduces an additional distinction between plants under national jurisdiction and plants under regional control. The industrial activities under national competence are the installations considered more pollutants, due to the type of activities or the extension of the plant; for this purpose the decree considers specific threshold limit values referred to the power for energy industries or to the quantity of products manufactured for chemical industries.

Italian IPPC installations are approximately 6000, spread over almost all the national territory, but localized mainly in northern Regions (Fig. 1). Even if numerically the central part of the north of Italy is characterized by a massive presence of industrial activities subject to IPPC, there are some specific industrial areas where more installations, even of different types, such as energy industries, refineries, chemical industries, are concentrated in limited portion of territory. These areas (shown in white in the figure), are located throughout the country and are more exposed to possible changes in the environmental balances, with serious consequences in the different environmental matrices, atmosphere, water or soil, that can represent a high risk factor for environment and population. For this reason these areas

are monitored with a special attention in the activities covered by the IPPC regulations.

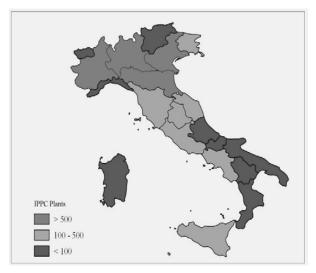


Fig. 1 Regional distributions of IPPC installations (data source [10] data processing CNR-IIA)

## III. AIR QUALITY IN AREAS WITH HIGH CONCENTRATION OF INDUSTRIES

The Directive 2008/50/CE [4] on ambient air quality and cleaner air for Europe and the Legislative Decree 155/2010 [7], Italian transposition of European regulation, govern air quality in order to maintain and, if possible, improve the environmental reference context to safeguard human health, vegetation and ecosystems, identifying and implementing the most effective measures to reduce atmospheric emissions. To this end the Directive confirms the obligation for member States, already present in the previous regulations, to establish specific air quality plans for those zones and agglomerations where the levels of pollutants in ambient air exceed any limit value.

The Air quality plans must be prepared or implemented taking into account all the sources of pollution, such as traffic, domestic heating, agriculture and industrial facilities, to identify the specific contribute of each source and set out appropriate measures to reduce the pollution levels. In this regard, the presence of IPPC activities in a specific portion of territory, can contribute heavily to the overall emissive condition, causing a relevant worsening of environmental air quality. For this reason a careful analysis of the atmospheric emissions of single plants falling in a specific area and the interconnections between different IPPC installations placed in the same area are an efficient additional tool to establish the air quality plans and a good way to define suitable measures to lessen the pollution levels.

In Italy, the comparison of data on environmental air quality with the mapping of IPPC plants distribution, shows, in areas with a greater presence of industrial activities, a widespread critical situation, especially for the parameters NO<sub>2</sub> e PM10, because the normal contribution to these pollutants, mainly

due to vehicular traffic, is added to the fraction of industrial origin.

#### IV. THE IPPC PERMITS AND THE AIR QUALITY

The IPPC legislation establishes that each installation should operate only if it holds a permit. The permit includes all the measures necessary to achieve a high level of protection of the environment as a whole and to ensure that the installation is operated in accordance with the general obligations of the operator. The permit should also include emission limit values (ELV) for polluting substances, or equivalent parameters or technical measures, appropriate requirements to protect the soil and groundwater. The IPPC permit also defines the monitoring requirements as measurement methodology, frequency and evaluation procedure. The emissions monitoring of a specific plant may also give indications of the contribution of these emissions on the air quality of a definite area.

In the IPPC permits, the BAT Reference Document (BRef) of the European Community, drawn up for defined activities, are the reference documents to set the conditions to operate the installation such as the correct emission limit values linked to the defined industrial activities. In particular, indeed, these documents describe, for a defined activity, the Best Available Techniques (BAT), their applicability and their consumption and emission levels associated. These BAT are set to prevent and, where that is not practicable, to reduce emissions and the impact on the environment as a whole.

In Italy, this new integrated approach has totally changed the licensing framework contributing to the achievement of a relevant emission reduction. In the past, the permits were based on different approaches to controlling emissions into air, water or soil separately which might the shifting of pollution from one environmental medium to another rather than protecting the environment as a whole. By the IPPC permit, the previous authorizations were updated to the real emissive frame of the industrial activities, introducing more stringent measure for a better environmental protection, as stated by European BRefs. Taking as example an existing plant which falls under the definition of "Large Combustion Plant", with a rated thermal input of 50 MW or more, and the two pollutants classes more dangerous for the air quality, NO<sub>X</sub> (Table I) and dust (Table II), it is relevant the difference between the previous Italian Legislative Decree 152/2006 [8] limit values and the new limit values based on the emission levels associated with the Best Available Techniques defined by the BRef for Large Combustion Plants [9], which is the document to elaborate the new permits for the national combustion plants with a rated thermal input  $\geq 50$  MW.

The emission levels associated with the best available techniques are the range of emission levels obtained under normal operating conditions using a best available technique or a combination of best available techniques, expressed as an average over a given period of time, under specified reference conditions. If then the emission limit values (ELV) set in the IPPC permit are near to the lower range of emission levels

associated with the BAT, the differences with previous emission levels permitted is obviously significant.

TABLE I EMISSION LIMIT VALUES (mg/Nm³) FOR NO $_{\rm X}$  Set by Legislative Decree 152/06 for an Existent Combustion Plant with a Rated Thermal Input  $\geq$  50 MW as Compared with Those Associated with the BAT of Bref for Large Combustion Plants

BREF FOR LARGE COMBUSTION PLANTS									
Legislative Decree no. 152/06		BRef for Large Combustion Plants							
Capacity (MWt)	Limit value mg/Nm <sup>3</sup>	Capacity (MWt)	Limit value mg/Nm <sup>3</sup>						
solid fuel									
50 - 500	600	50 - 100	90 - 300						
		100 - 300	100 - 200						
> 500	200	> 300	90 - 200						
liquid fuel									
50 - 500	450	50 - 100	150 - 450						
		100 - 300	50 - 200						
> 500	200	> 300	50 - 150						
		gaseous fuel							
50 - 500	300	Gas Turbines or CCGT without supplementary firing	50 - 90						
> 500	200	CCGT with supplementary firing	20 - 90						
> 500	200	gas-fired boiler	50 - 120						

We can observe such significant differences in Table III on "Emission limit values in some permits of large combustion plants with a rated thermal input  $\geq 300 \text{ MW}$ ".

We can have an evaluation of the potential environmental benefits obtained thanks to more stringent limit values set by IPPC permits by determining the reduction percentage in respect to emission limit values of the previous permits based on the Legislative Decree 152/2006 [8] (Fig. 2, 3, 4).

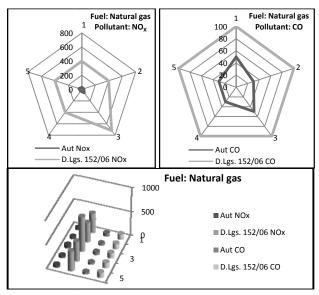


Fig. 2 Potential reduction percentage of emission levels achieved with the AIA permits for plants using gas fuel listed in table III (data source [10] data processing CNR-IIA)

TABLE II EMISSION LIMIT VALUES (mg/Nm³) FOR DUST SET BY LEGISLATIVE DECREE 152/06 FOR AN EXISTENT COMBUSTION PLANT WITH A RATED THERMAL INPUT  $\geq$  50 MW AS COMPARED WITH THOSE ASSOCIATED WITH THE BAT OF BREF FOR LARGE COMBUSTION PLANTS

Legislative Decree no. 152/06 BRef for Large Combustion Pla							
Capacity (MWt)	Limit value mg/Nm <sup>3</sup>	Capacity (MWt)	Limit value mg/Nm³				
solid fuel							
50 - 500	50	50 - 100	5 - 30				
		100 - 300	5 - 25				
> 500	50	> 300	5 - 20				
	liq	uid fuel					
50 - 500	50	50 - 100	5 - 30				
		100 - 300	5 - 25				
> 500	50	> 300	5 - 20				

TABLE III EMISSION LIMIT VALUES IN SOME PERMITS OF LARGE COMBUSTION PLANTS WITH A RATED THERMAL INPUT  $\geq 300~\text{MW}$ 

$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$	Rif	Туре	Fuel	Capacity (MWt)	Limit of AIA permit (Limit of D.Lgs. 152/06) mg/Nm <sup>3</sup>			
$\begin{array}{c ccccccccccccccccccccccccccccccccccc$		J I -						Dust
2 CCGT NG ≈ 700 (400) - (100) - (100) 3 combustio n plant oil 3200 in all (200) (400) (250) (50 4 combustio n plant oil 200 each one (450) (1700) (250) (50 5 CCGT NG G1+G2 30 - 30 - 30 1500 in all (400) - (100) - (100)  CCGT NG G1+G2 60 50 635 each one (720) (100)  combustio n plant combustio n pla	1		coal	$\approx 400 \text{ each}$				20 (50)
10   CCGT   NG   Combustio   n plant   combustio   coal   3 units   80   80   120	2	CCGT	NG	$\approx 700$		-		-
4         n plant         oil         200 each one         (450)         (1700)         (250)         (50)           5         CCGT         NG         G1 + G2         30         -         30         -           CCGT         NG         G1 + G2         30         -         30         -           CCGT         NG         G1 + G2         60         50           6         combustio         G3 + G4         20         (100)           n plant         coal         G3 + G4         200         (400)         (250)         (50           n plant         coal         G5         90         80         120         10           eombustio         n plant         coal         3 units         80         80         120         10           eombustio         n plant         coal         3 units         80         80         120         10           eombustio         n plant         coal         3 units         80         120         30           eombustio         n plant         coal         4260 in all         (200)         (200)         (250)         (30           eombustio         n plant         coal         42	3		oil					20 (50)
CCGT NG   1500 in all   (400)   - (1	4		oil					25 (50)
CCGT NG 635 each one (720) (100)  combustio n plant coal 400 each one (600) (800) (250) (50  605 90 80 120 11  858 (200) (400) (250) (250) (30  80 120 8  80 120 8  80 120 8  80 120 8  80 120 8  80 120 8  80 120 8  80 120 8  80 120 8  80 120 8  9 CCGT NG 685 each one (400) - (10	5	CCGT	NG			-		-
Combustio   Part   Combustio   Part	6	CCGT	NG					
7 n plant combustio n plant coal 3 units 80 80 120 88 4260 in all (200) (200) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (300 90) (250) (250) (300 90) (25	6		coal					15 (50)
combustion n plant         coal combustion n plant         GS SS (200) (400) (250) (50 (400) (250) (50 (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (250) (400) (400) (250) (400)	7		coal					20 (50)
8	/		coal					10 (50)
9 CCGT NG 685 each one (400) - (100) - 10 CCGT NG 2 units 40 - 30 (100) - (100	8		coal					(30)
10 CCGT NG 2 units 40 - 30 (100) - combustio oil 2 units 100 200 50 20	9	CCGT	NG			-		-
combustio oil 2 units 100 200 50 20	10	CCGT	NG			-	30	-
n plant 417 each one (450) (940) (250) (50	11		oil		100	200 (940)	. ,	20 (50)
combustio oil 2 units 150 200 50 20		combustio	oil	2 units	150	200	50	20 (50)

The operational conditions set in the IPPC permits are also based on the regional plans and programmes, as the air quality plans, which could lead to stricter permit conditions. Indeed, the article 18 of the European directive 2010/75/UE [1] says that "Where an environmental quality standard requires stricter conditions than those achievable by the use of the best available techniques, additional measures shall be included in the permit, without prejudice to other measures which may be taken to comply with environmental quality standards".

Therefore, at the end to reduce the emissions at source, the air quality plans are binding also to set the emission limit

values in the IPPC permits, which cannot be less strict than those defined by the local regulations.

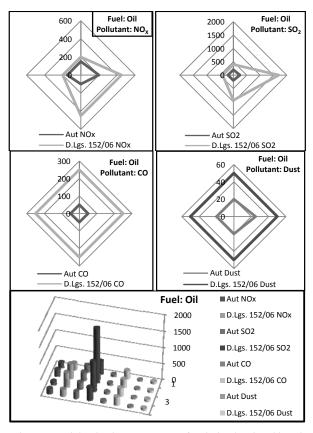


Fig. 3 Potential reduction percentage of emission levels achieved with the AIA permits for plants using liquid fuel listed in Table III (data source [10] data processing CNR-IIA)

For example, it is relevant the case of a coal combustion plant for which the air quality plan stated, as implementation measures for the reduction of emissions from stationary sources, the decommissioning of the plant. In accordance with the regional planning document and the regional advice expressed during the IPPC technical procedure, the first IPPC permit, for the above mentioned combustion plant, stated an to best available techniques decommissioning of the installation. Since the operator did not intend to adopt measures required to adapt the installation to the BAT, the IPPC permit update has regulated the progressive decommission of the all units of the installation. This decommission will end on 2017.

### V.CONCLUSION

The regional plans of air quality represent a relevant instrument to determinate and to attribute the emissive contributions to pollution level of ambient air in a specific territory with exceedances of limit values for a given pollutant and to set out appropriate measures to improve the environmental conditions. The air quality plans might be prepared or implemented in respect of several pollutants and

therefore, where appropriate, these plans should be integrated, covering all pollutants concerned.

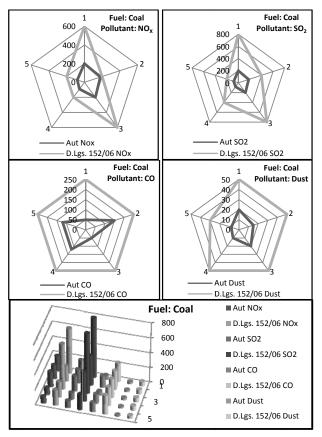


Fig. 4 Potential reduction percentage of emission levels achieved with the AIA permits for plants using solid fuel listed in Table III (data source [10] data processing CNR-IIA)

Therefore, an efficient mean to assess the possible contributions to pollutants from industry and also to individuate the correct approach to achieve the related limit value or target value is the regional air quality plans.

As stated above the IPPC permits might became a valid tool both to enhance the environmental framework and to achieve the standards fixed for the air quality.

This direct connection between the two laws on air quality and IPPC is fundamental in the "areas with a high industrial concentration", where the contribution of the industry to the air quality is significant.

As explained, the issue of IPPC permits created a relevant cut of the industrial emission levels; this decrease should produce an air quality improvement in the plant area. In the near future, thank to the release of new BRefs, currently under revision, there might be a further improvement of the emission framework, due to a stricter emission limit values which will lead to an additional reduction of the pollutants generated by different industrial activities.

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