

The signification of integrated prevention and pollution control

Dominika OČENÁŠOVÁ

Slovak Inspectorate of Environment

ABSTRACT

The mean of „integrated environmental protection“ take into consideration all sectors of environment impacts (air, water, waste) like a complex instead of separated view on each sector particularly. The reason of this concept is that substances and emissions outflow from one environmental sector can cause transport to another environmental sector.

The attitude in integrated process represents change from applied segment system of assessment and permitting installations to the integrated permitting. Integrated permit doesn't mean increased responsibilities contrariwise allow operators be actively connected to the permitting, transpose their own ideas in communication between competent authority and operator.

Key words

competent authority, operator, IPPC, integrated permit, installation

INTRODUCTION

Integrated prevention and industrial pollution protection is a set of measures aimed at pollution prevention, reduction of emissions to air, water and soil, reduction of waste generation and at waste recovery and disposal in order to achieve a high level protection of the environment taken as a whole, whereas is focusing on industrial sphere.

Integrated pollution and prevention control presents a shift from keeping each environmental sector (air, water, waste) to industrial activities. By industrial activities is then divided also the field of IPPC activity.

INTEGRATED PERMITTING PROCESS

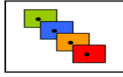
Integrated permitting is process which is opened to general public. Except negotiate participants and competent authorities can also take part civil community of physical people, interest group of juridical people and people that can be connected with integrated permitting process [1].

Before publishing integrated permission preceded demanding and lengthy process which begins with sending operator a notification and continues with running negotiating application. Integrated process itself begins when operator submits an application and then ensue its processing and verifying information in installation. After oral hearing and each condition of permission is agreed with operator then is issued an integrated permission [2]. To issue integrated permission lasts 60 days from oral hearing (it was 90 days in Old Act 245/2003 of IPPC) and maximum 5 months (it was 6 months in Old Act 245/2003 of IPPC) from the process beginning – from clear and right filled up application.

MANDATORY ENVIRONMENTAL CONDITIONS

In order to receive a permit an industrial or agricultural installation must comply with certain basic obligations. In particular, it must:

- use all appropriate pollution-prevention measures, namely the best available techniques (which produce the least waste, use less hazardous substances, enable the substances generated to be recovered and recycled, etc.);
- prevent all large-scale pollution;
- prevent, recycle or dispose of waste in the least polluting way possible;
- use energy efficiently;
- ensure accident prevention and damage limitation;
- return sites to their original state when the activity is over.



In addition, the decision to issue a permit must contain a number of specific requirements, including:

- emission limit values for polluting substances (with the exception of greenhouse gases if the emission trading scheme applies - see below);
- any soil, water and air protection measures required;
- waste management measures;
- measures to be taken in exceptional circumstances (leaks, malfunctions, temporary or permanent stoppages, etc.);
- minimisation of long-distance or transboundary pollution;
- release monitoring;
- all other appropriate measures.

In order to coordinate the permit process required under the Directive and the greenhouse gas emission trading scheme, a permit issued in compliance with the Directive is not obliged to contain the emission limit values for greenhouse gases if these gases are subject to an emission trading scheme, provided there is no local pollution problem. The competent authorities can also decide not to impose energy efficiency measures targeted at combustion plants [5].

Using BREF's in IPPC Permit

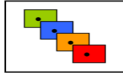
When evaluating the BAT for the applicant, it is important that the applicant and the authority makes reference to the actual BAT Reference Documents used, and argue for the choice of document. In the comparison of the applied production to the BAT notes it is looking at the possible substitution of dangerous substances, and then on the technological processes. It shall be described which dangerous substances are used in the production, and what should be done in terms of substitution to reach BAT. It shall be described which processes are used in the production, and what should be done to reach BAT. A subdivision of this paragraph into single processes can be useful for clarification. All new productions shall apply BAT according to the definition in the IPPC Directive. For existing companies it should be described:

- whether the process uses BAT and if not - why not,
- which terms in the permit that will ensure that a plan towards BAT will be mandatory for the installation,
- time limits and why it is necessary to give the installation time to apply BAT [4].

When we are talking about IPPC installations, the main principle of integrated permitting is the compliance of the installation with emission values in best available techniques. In Slovakia especially in industry, with several operating devices are at the border, respectively after the border of his life, is entitled to a presumption of high economic performance into line with BAT. Issued integrated permits indicate that in many cases emission limits were set up for existing installations in accordance with the emission limits which are in component implementing Acts and Regulations and not from BAT. As already stated, the emission limit values set out in the annexes to the IED are only minimum requirements for exemption which may be granted only in justified exceptional cases and right in the IPPC permit. Each case will have to be reported to the European Commission.

If in integrated permit will be allowed higher value, as indicated in the BREF (higher than specified in the European Commission decision on BAT conclusions), these emission limit value will have to be permitted by Paragraph 15 of IED as an exception. If the exemption reasoning will not the Commission considered relevant, will followed an official announcement that Slovakia does not fulfil the IED requirements and the European Commission shall set a deadline for the investigation and remediation (e.g. one year). If there will be no correction, the European Commission shall give notice to the European Court for sanctions against Slovakia. Many operators will have to make investments in separation of emissions of several pollutants and emissions to different environmental sections (air, water, soil).

At this point it must be noted that many operators still consider that in compliance with BAT mean the compliance with emission limits to air. They do not realize that BAT by means of BREF also defines limit values for emissions to water, soil and threshold parameters for example - for organic substances content in the starting materials or materials which are take into account energy efficiency across production, follows the material and energy flows, production and waste management etc. In fact, there can be situation when the installation that complies with the emission limits for pollutants into the air, will not be in accordance with BAT in other parameters, for example: energy efficiency of production or the contents of organic substances in the input material. Replacement with new material may be economically difficult for installation, sometimes liquidating. Actual costs to comply with BAT are expected very high [3].



CONCLUSION

Integrated permitting is process in which are set conditions for defined industrial activities in installations. New installations are permitted to meet the target – integrated environmental protection and protection of all environmental sectors, to keep the pollution degree in environmental quality standards.

The main target of integrated prevention is to protect environment like a whole before industrial and agricultural pollution by regulating installations. In spite of integrated permitting is still relatively new problematic in markedly lesser extend come to breaking

of duties which followed from integrated permits. The operators, which are under the IED Directive, are satisfied, that they don't need to ensure so many permits from different competent authorities as in the past. All conditions of installation operation are contained in one integrated permit.

Integrated permit doesn't mean increased responsibilities contrariwise allow operators be actively connected to the permitting, transpose their own ideas in communication between competent authority and operator what existing practice doesn't allowed.

BIBLIOGRAPHY

- [1] NITSCHNEIDEROVÁ, H. 2005: The role of SIE like a permitting authority. - In: Enviromagazín. Banská Bystrica: MŽP SR a SAŽP, p.6-7. ISSN 1335-1877. [in Slovak]
- [2] Slovak Inspectorate of Environment: An Annual report 2007. [online]. Available on-URL: ><http://www.sizp.sk/>< [in Slovak]
- [3] A study of the impact of industrial emissions on Industry and Energy Slovak Republic ASPEK September 2010, the Association of Industrial Ecology in Slovakia [in Slovak]
- [4] PETROVSKA, S. - ACESKA, N. - PETROVSKA, M.: Role of IPPC Permit in the Process of Reduction of Pollution Caused by Waste Water in Two Pilot Plants in the Municipality of Prilep [online]. - Available on-URL: >http://www.balwois.com/balwois/administration/full_paper/ffp-1438.pdf<
- [5] Integrated pollution prevention and control. - [on-line] Available on - URL: http://europa.eu/legislation_summaries/environment/waste_management/l28045_en.htm

CONTACT ADDRESS

Author: Ing. Dominika OČENÁŠOVÁ, PhD.
Workplace: Slovak Inspectorate of Environment, Department of Integrated Prevention and Pollution Control - Headquarter
Address: Karloveská 2, 842 22 Bratislava
E-mail: dominika.ocenasova@gmail.com