

BAT Conclusions Gap Analysis

Background

The Industrial Emissions Directive, transposed into UK law through the Environmental Permitting (England and Wales) Regulations, provides that the key elements of the Best Available Techniques (BAT) reference documents (BREFs) are transposed into BAT-Conclusions, and these should provide the basis for setting Environmental Permit conditions.

BAT-Conclusion documents are being prepared as the existing BREFs are being reviewed and hence a number have already been published, including the BAT-Conclusions for the manufacture of glass, large volume organic chemicals and waste treatment activities.

However, all sector BREFs will ultimately have a BAT-Conclusions document and once published, Member States have four years to ensure that the Permits associated with any particular sector are compliant with the requirements of the BAT-Conclusions.

What does it all mean?

Any new installation requiring an Environmental Permit will need to comply with the BAT-Conclusions. This will include the use of techniques which can achieve or better the emission levels associated with the use of BAT.

Existing installations will also need to comply and should use the four-year transitional period to ensure that they can meet the terms of the BAT-Conclusions and hence their future Permit conditions.

The starting point along that journey is the preparation of a gap analysis.

Understanding the requirements of the BAT-Conclusions documents and assessing where your operation does and does not currently comply with the requirements is a critical element of the Permit review process. Some regulators demand it and will issue Operators with a request for a gap analysis. However, even where this formal process is not engaged, all Operators are recommended to undertake the assessment in order to ensure that they will be able to comply with the requirements of their future Permit.

Environmental Visage can prepare a gap analysis of your process against the relevant BAT-Conclusion document. The output of the analysis can then be used to identify where further investigations or improvements are required in advance of any Permit issue or revision, enabling the scheduling of process upgrades or revision of procedures across the four-year implementation period.

Not only does this enable the spread of any effort and cost across the maximum available timeframe, it also ensures that when the four-year transitional period ends, your site can be fully compliant with the revised Permit conditions.

So, if your operation requires an Environmental Permit and you need assistance to assess the compliance of your existing or proposed activities against Best Available Techniques, give us a call on 01453 752731 to see how we can help.



Stroud House, Russell Street, Stroud, Gloucestershire, GL5 3AN
Tel / Fax: 01453 752731 | Enquiries@En-Visage.co.uk