Examples of better enforcement of Chapter V of Industrial Emissions Directive in Germany
Examples of better enforcement of Chapter V of Industrial Emissions Directive in Germany

Summary of German country experience:

“Enlargement of scope of Chapter V IED Article 59 (5)”: Application of German TA Luft 2002 No 5.2.5 Class I

-> emission limit value for stack emission = total over all No 5.2.5 Class I pollutants in a stack: 20 mg/Nm³

Details: See separate presentation!
“Enlargement of scope of Chapter V IED by reduction of lower solvent consumption threshold”:

Examples:

Wood coating: Germany: 5 tons/year; EU IED Chapter V: 10 tons/year

“Stricter Requirements in stack emission limit values”:

Application of thermal oxidizers (like RTO) -> emission limit value for stack emission = 20 mg C/Nm³

Vehicle serial coating: lower emission limit values + additionally emission limit value for stack emissions of dryers 50 mg C/Nm³
“Stricter Requirements in fugitive emission limit values and/or total emission limit values”:

*Example:*

Manufacturing of paints: total emission limit value: IED: “5 resp. 3 % of input”; **German 31. BImSchV: “3 resp. 1 % of input”**

“Stricter Requirements in application of a reduction scheme”:

*Example:*

Adhesive coating: Multiplication factor: IED: “4”; German 31. BImSchV: 3
“Fugitive Emissions”:

Especially for coating activities: Differentiation within O1 = Emission in waste gases

O1.1 = captured cleaned (treated) waste gas

O1.2 = captured not cleaned (untreated) waste gas

For certain installations:

O1.2 is considered as fugitive emission!

-> Problem with „dilution or cooling“ with air is left out

-> No discussions necessary according to fugitive emissions sources!

-> Numerous installations without exhaust gas abatement technique will choose the reduction scheme = compliance of 31. BImSchV through primarily measurements (avoidance of VOC emissions)

Details: See separate presentation!
“Consideration of the principle of precaution for large installations needing an environmental permit (§ 4 sentence 4 of 31. BImSchV)”

No hazardous impacts to the environment may be caused – always the BAT must be applied

For example: Additionally to the application of a reduction scheme: -> fixation of emission limits for captured waste gas sources

**Details: See separate presentation!**

Reduction scheme: “Simplified verification” for small coating installations (< 15 tons/y solvent consumption):

Compliance by using substances with a maximum content of organic solvents – no annual solvent management plan necessary!

**Details: See separate presentation!**
“Especially requirements for emission measurements at stacks for installations requiring an environmental permit – emission monitoring”

Details: See separate presentation!
Disclaimer

This presentation is a non-commercial product. No use of this publication may be made for resale or any other commercial purpose.

However, the presentation itself is not an official EU or document of German authorities and does not represent EU or policy of others. The views expressed above are those of the authors. This document is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this document or any part thereof, is made known. Any such party relies on the document at their own risk.

This presentation may not be published in any medium like Internet. All rights remain to the authors.