

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



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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!

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