
SEPA Meeting 27th November 2017

KINNEIL PPC PERMIT VARIATION VN06 – FLARING NOISE CONDITIONS (1)

- Conditions 6.1.1 and 6.1.2 deleted – Removes non-compliances on 2 ground flares available per train
- New Conditions 5.1.12 and 5.1.13 require specific noise from elevated flaring at Nether Kinneil (NK) not to exceed 54dB at night time (2300 – 0700) from 30th April 2018 during -
 1. Any Train Start-up
 2. Any other flaring event that involves elevated flaring that continues for more than 12 hours
- New Conditions 5.1.14/15/16 require demonstration of compliance with 5.1.12 and 5.1.13 by noise measurements or noise modelling by suitably qualified and competent personnel.

KINNEIL PPC PERMIT VARIATION VN06 – FLARING NOISE CONDITIONS (2)

- Condition 5.1.5 altered to require notification of any flaring event resulting in total flaring >25tph for >60 minutes in accordance with Condition 2.4.4 (Incident Notification).
- Condition 5.1.6 altered to require 4 x night-time noise measurements at NK for 5.1.5 flaring events.
- New Condition 3.1.6 requires that all appropriate preventative measures are taken against noise and vibration emissions through application of BAT and ensure that no significant pollution is caused.

KINNEIL PPC PERMIT VARIATION VN06 – COMPLIANCE CONCERNS (1)

- SEPA's 'Guidance on the Control of Noise at PPC Installations - Section 2.4 Options for Permit Conditions' states –
- *"Consistent with SEPA's regulatory aims and objectives in all media the overriding requirement of any conditions placed within a PPC permit must be that they are:*
 - *Necessary*
 - *Unambiguous*
 - *Comprehensive*
 - *Enforceable"*
- *"Numerical limits should be applied only when there is particular need and a demonstrable benefit. The limits applied should be appropriate to the particular situation. Determination of compliance in any meaningful way can be very time consuming and expensive and may not provide any real benefit."*

KINNEIL PPC PERMIT VARIATION VN06 – COMPLIANCE CONCERNS (2)

- We do not believe there is a “particular need” for the numerical limit condition due to the infrequency of the occurrence of noise related complaints. We do not have any evidence that significant pollution is being caused.
- The numerical limit will not currently provide any “demonstrable benefit” because in most instances there will be no reasonable measures we could implement to comply with it given the current availability and operation of the ground flares. It is also highly likely that we will be unable to comply during a Train 3 restart for the same reason.
- We do not believe compliance could be demonstrated “in any meaningful way” by measurement. Compliance may be able to be achieved through modelling but this needs further work, and discussion and agreement with SEPA.

KINNEIL PPC PERMIT VARIATION VN06 – COMPLIANCE CONCERNS (3)

- Regarding the new Condition 5.1.5, we do not see the justification or rationale for notifying the following flaring events >25tph for >60 minutes as 'Incidents' in accordance with Condition 2.4.4 –
 1. Scheduled flaring events, including planned Train start-ups
 2. Train 3 flaring events during day time hours
 3. Train 3 flaring events where the flaring is entirely on ground flares
 4. All Trains 1/2 flaring events - Historical noise monitoring has indicated that there does not appear to be a significant impact on noise levels at NK even at high steam control valve settings
- New Condition 3.1.6 – All encompassing wording, how do we practically demonstrate compliance with this ?

KINNEIL PPC PERMIT VARIATION VN06 – ALTERNATIVE PROPOSAL

- INEOS FPS intend to improve the availability and operation of Train 3 ground flares, but this will take time.
- Replace Conditions 5.1.12/13/14/15/16 with new Condition requiring INEOS FPS to provide to SEPA by 30th June 2018 an Improvement Programme setting out proposals for reducing noise from elevated flaring taking account of the objective of limiting night-time noise at NK to 54dB, based on modelling for Train 3 and Trains 1/2 elevated flares.
- Update Condition 5.1.5 to address our concerns on previous slide.
- Replace Condition 3.1.6 with new Condition requiring flaring activities at the installation to be conducted in accordance with the following reports:
 1. Assessment of Best Available Techniques for Flaring Activities at Kinneil
 2. The Kinneil Flaring Noise Management Plan.