

Lagan Cement

A licensee's perspective on altering an IPC licence.

David Tobin
26th February, 2015

Lagan Cement

- 3 EPA licensed facilities in 3 counties
 - Lagan Brick
 - Lagan Clay Products
 - Lagan Cement
 - Lagan Cement facility is 350 ha, processing up to 1 million tonnes of rock per annum.
 - Lagan Cement provides 70% of its thermal energy with waste derived fuels.
- Currently in the middle of review number 7 for the cement plant.

Change is Inevitable

- All businesses evolve:-
 - Markets change
 - Products change
 - Locations change
 - Raw materials change
 - Production technologies change
 - Change can be sudden and dramatic
 - Change can be major or minor
- The IPC licence is a strict legal document, based on EU directives.
- The regulatory regime can be significantly less accommodating to change than a business would like, or need.

What kind of change?

- Primary questions for business are:-
 - Will the change impact the terms of the licence?
 - Is the change major or minor?
 - Do we need the change in a hurry?
 - Does the change require planning permission?
 - Is an EIS and/or an AA required?
 - Is there a Seveso implication?

“Significant” Change or Minor Change?

Significant

- A new major emission point is added
- The process needs to move to bigger premises
- Fossil fuels are substituted with waste derived alternatives

Insignificant???

- New raw materials
- New products.
- Changed waste streams
- Restarting previously permitted process

Methods of Accommodating Change

1. By agreement (written OEE approval)
2. By technical amendment
 - The scope of technical amendments has become very limited in recent years.
3. Full licence review

Licence change can be slow

- Change requiring a full licence review can take years to complete.
- Technical amendments can take more than one year.
- Time delays can be very costly for business and can be terminal if a business cannot react as quickly as an overseas competitor.
- There is also a need to speed up the existing review process. All reviews should be able to be completed in significantly less than one year.

Licence change can be complex

- There can be planning implications
- EIA/AA
- There can be Seveso implications
- Legislation can change during the review process, further stalling or complicating the review.
- There is need for a fast and streamlined mechanism to accommodate medium level changes and correct errors in licences.

Example of medium level change

- A company **has** to use a new raw material. Its use will result in an increase in an emission parameter beyond the ELV stated in the existing IPC licence.
- A revised ELV is required, or the company will fail to comply with the existing ELV.
- The new ELV is still within a range considered to be BAT.
- The company does modelling and can unequivocally show that there is no demonstrable harm to the environment as a result of the increased emission.
- Is a full licence review required?
- What does the company do in the meantime?
- Do the public need a say if there is no harm to the environment?

The role of IBEC's EPC

- Facilitate ongoing constructive dialogue between industry and EPA towards ensuring strong and sensible regulation and implementation of best practice.
- Participate in EPA consultation programmes to assist the EPA in producing guidance documents that are practical and workable.
- Monitor and report on best practice across Europe with regard to licensing.
- Communicate to government the importance of adequate resources for the EPA.

Conclusions

- Business participation on the EPC allows IBEC to have a strong leadership role with regard to environment policy and regulation.
- EPC engagement with the EPA and Department is essential to foster better mutual understanding, better regulation and strong workable environmental policies, which protect both the environment and our economic competitiveness.