



## CASE STUDY

# NHS Greater Glasgow & Clyde – Glasgow Medium Combustion Plant Directive

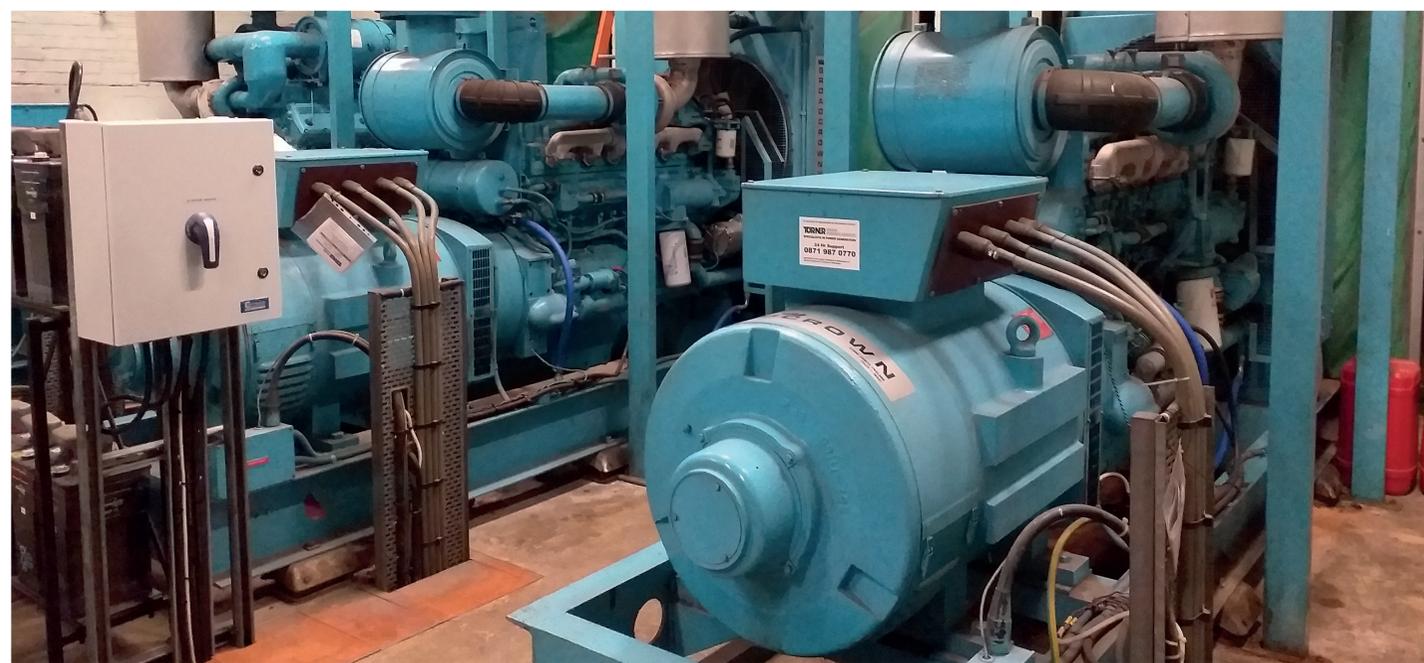
### FOCUS AREA

Conserving natural resources, such as fossil fuels and water, and protecting the environment from all forms of man-made pollution is the keystone of environmental sustainability for both planetary and population health. Environmental Management Systems (EMS) provide the framework that helps improve our energy and water efficiency and our environmental sustainability.



### ENVIRONMENTAL MANAGEMENT

For more information contact [nss.sustainabilityscotland@nhs.net](mailto:nss.sustainabilityscotland@nhs.net)



### BACKGROUND AND AIMS

In 2015 the EU Pollution Prevention Control (PPC) permit regulations changed, introducing a new Medium Combustion Plant Directive (MCPD) (captured in the The Pollution Prevention and Control (Scotland) Amendment Regulations, 2017). They amend the Pollution Prevention and Control (Scotland) Regulations 2012 to add provisions relating to medium combustion plants (MCPs). This meant that all medium sized stationary combustion plants (e.g. boilers, Combined Heat and Power (CHP), diesel generators (running over 200 hours etc.) have to register or have a permit. These types plant will be measured on their Emission Limit Values (ELV's) emissions of sulphur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>) and dust.

The directive aims to reduce these emissions and the resultant risks to human health and the environment. It also requires monitoring of carbon monoxide (CO) emissions. Permits are required to be applied for by June 2024 or 2029 (depending on the size of the plant).

| Size   | Register/permit              | Comply with ELVs             |
|--------|------------------------------|------------------------------|
| 5-50MW | 1 <sup>st</sup> January 2024 | 1 <sup>st</sup> January 2025 |
| 1-5MW  | 1 <sup>st</sup> January 2029 | 1 <sup>st</sup> January 2030 |

### ACTIONS

There are a number of NHS Greater Glasgow & Clyde sites that will potentially require a permit – the team at the Board have identified up to seven sites with multiple items of plant that will need to be reviewed for compliance and need for a permit.

In preparation for these NHS Greater Glasgow & Clyde are undertaking a full review by commissioning air emission testing across all seven sites as a benchmarking exercise to establish what plant is compliant or non-compliant, this will allow the Board time to retrofit or replace non-compliant plant in time for the registration deadline. This will be undertaken by an MCERTS accredited (Monitoring Certification Scheme) environmental monitoring company via a one-off round of testing prior to registration/permit application.

This process will include a full check of the operating arrangements of each item of plant, applying for permits where required and the development of a full compliance plan to cover ongoing monitoring reporting and costs.

### KEY IMPACTS

The findings from this exercise will be used to inform the maintenance and replacement of boilers and CHP plant in the future. This in turn may affect how plans for refurbishment or replacement of boilers are delivered moving forward.

Ultimately this will result in a reduction in emissions and improved local air quality, by ensuring plant is fully compliant with the regulations or by installing new compliant plant in existing buildings.

### LESSONS

This legislative change requires a full review of all applicable plant. The quicker this is done, the more time Boards will have to plan for retro-fits or replacement under Financial Incentive Plans (FIPS) and install more efficient and compliant plant before the deadline dates.

