



GUIDANCE NOTE 21

**ENVIRONMENTAL GUIDELINES
FOR AIR SEPARATION PLANT
AND EQUIPMENT ON SITES
REGULATED UNDER IPPC**

REVISION 2: 2016

British Compressed Gases Association

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PREFACE

The British Compressed Gases Association (BCGA) was established in 1971, formed out of the British Acetylene Association, which existed since 1901. BCGA members include gas producers, suppliers of gas handling equipment and users operating in the compressed gas field.

The main objectives of the Association are to further technology, to enhance safe practice, and to prioritise environmental protection in the supply and use of industrial, food and medical gases, and we produce a host of publications to this end. BCGA also provides advice and makes representations on behalf of its Members to regulatory bodies, including the UK Government.

Policy is determined by a Council elected from Member Companies, with detailed technical studies being undertaken by a Technical Committee and its specialist Sub-Committees appointed for this purpose.

BCGA makes strenuous efforts to ensure the accuracy and current relevance of its publications, which are intended for use by technically competent persons. However this does not remove the need for technical and managerial judgement in practical situations. Nor do they confer any immunity or exemption from relevant legal requirements, including by-laws.

For the assistance of users, references are given, either in the text or Appendices, to publications such as British, European and International Standards and Codes of Practice, and current legislation that may be applicable but no representation or warranty can be given that these references are complete or current.

BCGA publications are reviewed, and revised if necessary, at five-yearly intervals, or sooner where the need is recognised. Readers are advised to check the Association's website to ensure that the copy in their possession is the current version.

This document has been prepared by BCGA Technical Sub-Committee 8. This document replaces BCGA Guidance Note 21: Revision 1: 2012. It was approved for publication at BCGA Technical Committee 154. This document was first published on 11/05/2016. For comments on this document contact the Association via the website www.bcgaco.uk.

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* Throughout this publication the numbers in brackets refer to references in Section 4. Documents referenced are the edition current at the time of publication, unless otherwise stated.

TERMINOLOGY AND DEFINITIONS

May	Indicates an option available to the user of this Guidance Note.
Shall	Indicates a mandatory requirement for compliance with this Guidance Note and may also indicate a mandatory requirement within UK law.
Should	Indicates a preferred requirement but is not mandatory for compliance with this Guidance Note.

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1. INTRODUCTION

This document provides guidance on how BCGA members can assist their customers to comply with the European Directive on Integrated Pollution Prevention & Control (IPPC) (1). The Environmental Permitting (England and Wales) Regulations (EPR) (2) and The Pollution Prevention and Control (Scotland) Regulations (3) implement the Directive in the UK.

2. STATUS OF AIR SEPARATION PROCESS UNDER IPPC / EPR

Air separation is a physical not a chemical process and therefore not directly regulated under the scope of the IPPC directive or the relevant UK regulations. However there are situations where air separation plants may be regulated as a directly associated activity (as defined in the regulations).

The Environment Agency Regulatory Position Statement (RPS) 32 (4) indicates that, subject to certain requirements listed below, air separation processes do not need permitting under EPR.

RPS 32 (4) states that the Environment Agency (for England & Wales) will not pursue an environmental permit application for processes that are directly associated to an IPPC-listed activity as long as, it is operated 'in accordance with best practice guidelines on environmental performance'. This Guidance Note effects that requirement.

3. GUIDANCE FOR BCGA MEMBERS AND CUSTOMERS

To comply with RPS 32 (4) BCGA members shall follow the environmental best practices set out in the following European Industrial Gases Association (EIGA) documents:

- EIGA Document 60 (5), *Seveso documents. Guidance on applicability, assessment and legal documents for demonstrating compliance of industrial gases facilities with Seveso Directive(s).*
- EIGA Document 85 (6), *Noise management for the industrial gas industry.*
- EIGA Document 88 (7), *Good environmental management practices for the industrial gas industry.*
- EIGA Document 94 (8), *Environmental impacts of air separation units.*
- EIGA Document 107 (9), *Guidelines on environmental management systems.*
- EIGA Document 137 (10), *Environmental aspects of decommissioning.*

NOTE: The EIGA web site - www.eiga.eu - should be consulted to ensure the latest version of these documents is used.

The customer's EPR application must address the relevant environmental issues associated with uses of the gas within the customer's process (for example any role in emissions control systems or accident scenarios), and explain the role of gas company employees as contractors whilst working on the customer's site.

4. REFERENCES

Document Number	Title
1. EC Directive 2008/1/EC	Directive 2008/1/EC of the European Parliament and of the Council of 15 January 2008 concerning Integrated Pollution Prevention and Control.
2. SI 2010 No. 675	The Environmental Permitting (England and Wales) Regulations 2010 (as amended)
3. SI 2000 No. 323	The Pollution Prevention and Control (Scotland) Regulations 2000.
4. Environment Agency RPS 32	Regulatory Position Statement 32 Permitting of air separation units.
MWRP RPS 032. Version 3. November 2015	www.gov.uk/government/publications/permitting-of-air-separation-units
5. EIGA Document 60	Seveso documents. Guidance on applicability, assessment and legal documents for demonstrating compliance of industrial gases facilities with Seveso Directive(s).
6. EIGA Document 85	Noise management for the industrial gas industry.
7. EIGA Document 88	Good environmental management practices for the industrial gas industry.
8. EIGA Document 94	Environmental impacts of air separation units.
9. EIGA Document 107	Guidelines on environmental management systems.
10. EIGA Document 137	Environmental aspects of decommissioning.

Further information can be obtained from:

UK Legislation	www.legislation.gov.uk
Environment Agency (EA)	www.gov.uk/government/organisations/environment-agency
Scottish Environment Protection Agency (SEPA)	www.sepa.org.uk
Natural Resources Wales	http://naturalresourceswales.gov.uk
Northern Ireland Environment Agency	www.doeni.gov.uk
European Industrial Gases Association (EIGA)	www.eiga.eu
British Compressed Gases Association (BCGA)	www.bcgaco.uk



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