

From: [REDACTED] [mailto:[REDACTED]@bmub.bund.de]
Subject: IED article 13 FORUM - next meeting on 20 October 2016 GERMAN
comments on LCP BREF

Dear Representatives of the European Commission,

as already postulated in the split view (February and June 2016, see attachment), Germany again wants to emphasize its discontentment with the upper level of the yearly BAT-AEL range for existing lignite-fired pulverized combustion plants of ≥ 300 MWth (Table 10.3, footnote 9). Since most of the reference plants reported yearly average emission between 160 mg/Nm³ and 200 mg/Nm³, the determination of an upper level of 175 mg/Nm³ is not correct from a technical point of view.

Germany therefore expresses its strenuous appeal to set 190 mg/Nm³ as the upper level of NOx emissions for existing lignite fired pulverized combustion plants of ≥ 300 MWth to avoid unjustified obstacles during implementation.

Yours sincerely

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AG IG I 2 - Anlagenbezogene Luftreinhaltung - Plant related Air pollution
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