



The 2006 ESTAL Congress, Innsbruck (Austria)

**The IPPC Directive
and the
BREF Surface Treatment of Metals and
Plastics**

Paul Tempany

<http://eippcb.jrc.es>

paul.tempany@ec.europa.eu

European Integrated Pollution Prevention and Control Bureau





“European challenges for the aluminium surface treatment”
“Business Excellence in the aluminium surface treatment”

IPPC – a European challenge



IPPC - How it happened

Timescale

- The start of IPPC
- the role of 'perfidious Albion' (the UK)

Procedure

- differences between the legislation process and the BREF (Sevilla) process
- codecision process



Principles of IPPC

The **'Whereas' clauses (Recitals)...** set out the principles:

preventing pollution by intervention at source

management of natural resources – sustainable development

'polluter pays' principle

principle of pollution prevention

integrated approach



IPPCD - some key points

Permitting system – no ELVs in the IPPCD

Priority is in-process, not end-of-pipe

Specific BAT considerations:

time required to introduce BAT

consumptions as well as emissions

waste, recovery and recycling

site decommissioning

prevention of accidents



IPPC and the public

Provides for public access to (*Art 15 & 15a*):

permit applications for comment

permit and any updates

emissions data

European Pollutant Emissions (and Transfer)

Register of installations

access to the justice system



Art. 7 - Fully co-ordinated, integrated approach

Art. 9 - Conditions

ELVs or equivalent based on BAT

(but note a BREF gives only BATAELs)

Without prescribing any technique

Taking into account the technical characteristics of the installation ... high level of protection

MS may set general binding rules

Art. 10 – Tighter than BAT if necessary for EQS



BREFs and the Sevilla Process

Information exchange - how it works

Article 16(2)

Technical Working groups

Virtual information exchange

Advantages and Disadvantages

ESTAL's role - from the point of view of the EC
Qualanod's role



Key BAT for ESTAL (1)

Key environmental issues for anodising?

BAT:

5.1.1 Management

5.1.1.1 EMS

5.1.1.3 Minimising scrap (right first time?)

5.1.1.4 Benchmarking the installation

5.1.3 Agitation of solutions



Key BAT for ESTAL (2)

5.1.4.1 Electricity demands

5.1.4.4 Cooling

5.1.5 Waste minimisation of water

5.1.5.1 Water minimisation in-process

5.1.5.2 Drag-in reduction

5.1.5.2 Drag-out reduction

5.1.5.4 Rinsing



Key BAT for ESTAL (3)

5.1.6.4 Recycling and recovery

Re-use of materials externally

- Aluminium hydroxide for phosphate removal

5.2.11 Anodising specific

Heat recovery from sealing baths

Recovery of caustic etch (in certain cases)

Closed loop – not BAT for anodising

Use of PFOS-free surfactants



**The BREF for the
Surface Treatment of Metals
was adopted by
the European Commission on
Monday 7 August**



Who reads BREFs?

**60 000 downloads a year (all BREFs)
from Sevilla server = 70% all downloads**

Read world- wide (over 100 countries)

STM 7.4 day, about 2 000 a year (2nd Q)

‘Best sellers’: (a day)

Iron and steel	9.6
LCP	9.5 (Large Combustion Plant)
CWW	9.3 (Common waste water & waste gas)



The future

Implementation

Revision of the IPPCD

**Move STM from Annex 1, Section 2
to Annex 1, Section 6**

**Review of the role of BREFs, EIPPCB
and the Seville process**

Role of ESTAL and member companies



IPPC – *European challenge*

....or opportunity for business excellence?

... and any other questions?