FICHTNER

Consulting Engineers Limited



Viridor Tees Valley Ltd

BAT Assessment Report



Document approval

	Name	Signature	Position	Date
Prepared by:	Alice Merry		Environmental Scientist	25/06/2024
Checked by:	James Sturman		Principal Consultant	25/06/2024

Document revision record

Revision no	Date	Details of revisions	Prepared by	Checked by
RO	23/12/21	For Client comment	SDR	JRS
R1	28/02/22	Updated following client comments	SDR	JRS
R2	25/06/2024	Finalised for submission	ACM	JRS

© 2024 Fichtner Consulting Engineers. All rights reserved.

This document and its accompanying documents contain information which is confidential and is intended only for the use of Viridor Tees Valley Ltd. If you are not one of the intended recipients any disclosure, copying, distribution or action taken in reliance on the contents of the information is strictly prohibited.

Unless expressly agreed, any reproduction of material from this document must be requested and authorised in writing from Fichtner Consulting Engineers. Authorised reproduction of material must include all copyright and proprietary notices in the same form and manner as the original and must not be modified in any way. Acknowledgement of the source of the material must also be included in all references.



Contents

1	Intro	duction.		5
	1.1	Assum	ptions	5
2	Acid	gas abat	tement	7
	2.1	Option	ns considered	7
	2.2	Enviror	nmental performance	7
		2.2.1	Emissions to air	7
		2.2.2	Deposition to land	8
		2.2.3	Emissions to water	8
		2.2.4	Photochemical Ozone Creation Potential	8
		2.2.5	Global Warming Potential	9
		2.2.6	Raw materials	9
		2.2.7	Waste streams	9
	2.3	Costs		10
	2.4	Conclu	ısions	10
3	Nitro	ogen oxid	des abatement	11
	3.1	Option	ns considered	11
	3.2	Enviror	nmental performance	11
		3.2.1	Emissions to air	11
		3.2.2	Deposition to land	12
		3.2.3	Emissions to water	13
		3.2.4	Photochemical Ozone Creation Potential	
		3.2.5	Global Warming Potential	
		3.2.6	Raw materials	13
		3.2.7	Waste streams	14
	3.3	Costs		14
	3.4	Conclu	isions	14
4	Reag		ction	
	4.1	•	ns considered	
	4.2		nmental performance	
		4.2.1	Emissions to air	
		4.2.2	Deposition to land	
		4.2.3	Emissions to water	
		4.2.4	Photochemical Ozone Creation Potential	
		4.2.5	Global Warming Potential	
		4.2.6	Raw materials	
		4.2.7	Waste streams	
	4.3			
	4.4	Conclu	isions	18
5			techniques	
	5.1		ns considered	
	5.2		nmental performance	
		5.2.1	Emissions to air	19



	5.2.2	Deposition to land	19
		Emissions to water	
		Photochemical Ozone Creation Potential	
		Global Warming Potential	
		Raw materials	
		Waste streams	
5.3			
		sions	



1 Introduction

Viridor Tees Valley Limited (Viridor) is developing the Tees Valley Energy Recovery Facility (the 'Facility') to incinerate incoming non-hazardous residual waste. The Facility will be located at the site of the former British Steelworks in Grangetown, a large industrial brownfield site in Redcar and Cleveland BC in an area known as Grangetown Prairie.

In accordance with the requirements of the EA's Sector Guidance on Waste Incineration (EPR5.01), this report presents quantitative BAT assessments for acid gas abatement, nitrogen oxides abatement and Energy from Waste (EfW) technology for the Facility.

Each assessment follows the structure of Technical Guidance Note EPR-H1 and includes commentary on all of the environmental parameters identified in EPR-H1.

1.1 Assumptions

The Facility will use a moving grate as the combustion technology. The Facility will comprise of two streams, with a nominal design capacity of approximately 26.3 tonnes per hour of residual non-hazardous waste / Refuse Derived Fuel (herein referred to as incoming waste) per stream, with an average net calorific value (NCV) of 10.25 MJ/kg. This equates to a nominal design capacity of approximately 430,000 tonnes per annum, assuming 8,147 hours operation per annum. This has been used for the purposes of the BAT Assessment.

The maximum mechanical throughput is 34.1 tonnes per hour of waste for lower NCV wastes. The maximum annual throughput is 510,000 tonnes per annum assuming 8,760 hours operation per annum at 110% of the design point. However, this does not account for periods of start up, shut down and other periods of non-availability. Allowing for these periods, the maximum capacity of the Facility will be approximately 495,000 tonnes per annum.

The Facility will generate up to 48.2 MWe (design maximum) with a parasitic load of 4.63 MWe.

In addition, it is assumed that ammonia will be used for the Selective Non-Catalytic Reduction (SNCR) NO_X abatement system.

For the purposes of this assessment, we have undertaken a quantitative assessment of the available technologies for the proposed capacity using data obtained by Fichtner from a range of different projects using the technologies identified within this assessment.

In the operating costs sections, the following unit costs have been assumed:

•	Water	£0.85 per tonne
•	Lime Slurry	£90 per tonne
•	Lime	£110 per tonne
•	Sodium Bicarbonate	£155 per tonne
•	Activated Carbon	£605 per tonne
•	Ammonia	£114 per tonne
•	Sand (with defined particle size distribution)	£100 per tonne
•	Bottom Ash Processing	£15 per tonne
•	Lime APCR Disposal	£155 per tonne
•	Sodium bicarbonate APCR Disposal	£186 per tonne
•	Landfill Tax (1 April 2021)	£96.70 per tonne
•	Imported power	£70 per MWh
•	Lime APCR Disposal Sodium bicarbonate APCR Disposal Landfill Tax (1 April 2021)	£155 per ton £186 per ton £96.70 per ton



Electricity revenue£57 per MWh

2 Acid gas abatement

2.1 Options considered

There are currently three technologies widely available for acid gas abatement on waste incineration plants in the UK:

- 1. Wet scrubbing, involving the mixing of the flue gases with an alkaline solution of sodium hydroxide or hydrated lime. This has a good abatement performance, but it consumes large quantities of water, produces large quantities of liquid effluent which require treatment, has high capital and operating costs and generates a visible plume.
 - In the UK, wet scrubbing facilities are mainly used for treating hazardous waste where high and varying levels of acid gases in the flue gases require buffering capacity and additional abatement performance provided by a wet scrubber.
- 2. Semi-dry scrubbing, involving the injection of lime as a slurry into the flue gases in the form of a spray of fine droplets. The acid gases are absorbed into the aqueous phase on the surface of the droplets and react with the lime. The fine droplets evaporate as the flue gases pass through the system, cooling the gas. This means that less energy can be extracted from the flue gases in the boiler, making the steam cycle less efficient. The lime and reaction products are collected on a bag filter, where further reaction can take place.
- 3. Dry scrubbing, involving the injection of solid lime into the flue gases as a powder. The lime is collected on a bag filter to form a cake and most of the reaction between the acid gases and the lime takes place as the flue gases pass through the filter cake.
 - In its basic form, the dry system consumes more lime than the semi-dry system. However, this can be improved by recirculating the flue gas treatment residues, which contain some unreacted lime and reinjecting this into the flue gases.

Wet scrubbing is not considered to be suitable for the Facility, due to the production of a large volume of hazardous liquid effluent, a reduction in the power generating efficiency of the plant and the generation of a visible plume. The dry and semi-dry systems have been considered further within sections 2.2 to 2.4.

2.2 Environmental performance

2.2.1 Emissions to air

The impact of emissions to air is considered in the Air Quality Assessment, presented in Appendix E of the Supporting Information. The acid gas emissions were assessed at the daily emission concentrations of 30 mg/m³ for sulphur dioxide and 6 mg/m³ for hydrogen chloride. These emission limits are in accordance with the requirements of the BAT AELs.

Table 2-1 shows the emission concentrations at the stack and the predicted ground level concentrations for each option. For sulphur dioxide, the 99.18th percentile of the daily averages is shown. For hydrogen chloride, the annual average is shown. The emission concentrations for a semi-dry system are expected to be the same as for a dry system so the ground level impacts are also the same.

Table 2-1: Emissions to air

Abatement system		Dry		Semi-dry	
Pollutant	Units	SO ₂	HCI	SO ₂	HCI
Unabated emission concentration	mg/m³	480	900	480	900
Unabated emission rate	tpa	1,190	2,230	1,190	2,230
Abated emission concentration	mg/m³	30	6	30	6
Abated emission rate	tpa	70	10	70	10
Total emissions abated	tpa	1,120	2,220	1,120	2,220
Process Contribution (PC)	ug/m³	4.90	2.04	4.90	2.04
Background	ug/m³	2.00	1.42	2.00	1.42
Predicted Environmental Contribution (PEC)	ug/m³	6.90	3.46	6.90	3.46
Air quality objective	ug/m³	125	750	125	750
PC as % of AQO		3.92%	0.27%	3.92%	0.27%
PEC as % of AQO		5.52%	0.46%	5.52%	0.46%

The short-term impact of the Facility is 3.92% of the daily average air quality objective for SO_2 and 0.27% of the hourly air quality objective for HCl. Whilst the impact of HCl can be screened as insignificant at the point of maximum impact, SO_2 cannot be screened as insignificant, when applying the criteria stated in Environment Agency guidance note H1. Therefore, the PEC has been calculated. The PEC of the Facility for SO_2 is 5.52% of the daily average air quality objective, which can be described as a 'not significant' impact.

A more detailed assessment of the impact of emission of sulphur dioxide and hydrogen chloride is presented within the Air Quality Assessment within Appendix E of the Supporting Information.

2.2.2 Deposition to land

The impact of acid deposition on sensitive habitats has been considered in the Air Quality Assessment presented in Appendix E of the Supporting Information. As can be seen from the assessment, the impact of acid deposition on sensitive receptors is considered to be 'insignificant' at all habitat features.

2.2.3 Emissions to water

There are no emissions to water for either the dry or the semi-dry systems.

2.2.4 Photochemical Ozone Creation Potential

Sulphur dioxide has a photochemical ozone creation potential (POCP) of 4.8. Hence, the POCP for both the dry and semi-dry systems would be 340 tonnes ethylene equivalent.



2.2.5 Global Warming Potential

The direct emissions of greenhouse gases are the same for each option, as the emission concentrations for carbon dioxide and nitrous oxide are unchanged. However, the energy consumption is slightly different, which would change the power exported from the Facility. Therefore, the reduction in greenhouse gas emissions due to the displacement of power generated by other power stations would be different in each case.

The semi-dry system involves the evaporation of water. Since the reaction temperature of the lime and hence the outlet temperature should be the same, this means that the flue gas temperature at the inlet to the abatement system is higher for the semi-dry system than the dry system. Therefore, more power can be generated if a dry system is used.

In order to calculate the global warming potential of electricity consumption — assumed to be imported from the grid - the assumption of 371 g/kWh has been used, as applied in the greenhouse gas assessment presented in Appendix E of the Supporting Information. The global warming potential is therefore calculated as follows:

Carbon intensity of displaced electricity \times net power generation

The global warming potential associated with each option is presented in Table 2-2.

Table 2-2: Global warming potential

	Units	Dry	Semi-Dry
Power consumed	kWh/t	30	28.5
	MWh pa	12,880	12,230
Generation lost (water evaporation)	MWh pa		15,400
Power not exported	MWh pa	12,880	27,630
GWP	t CO ₂ pa	4,800	10,100

2.2.6 Raw materials

The estimated consumption of raw materials for both options is shown in Table 2-3.

Table 2-3: Raw materials

	Units	Dry	Semi-Dry
Additional water consumption compared to a dry system	tpa		36,000
Lime slurry	tpa		6,800
Lime	tpa	8,750	
Powdered Activated Carbon (PAC)	tpa	125	125

2.2.7 Waste streams

The only waste stream associated with the acid gas abatement treatment technologies is the Air Pollution Control residue (APCr). APCr is classified as hazardous waste. The estimated APCr production rate for both systems is listed within Table 2-4:

Table 2-4: Raw materials

	Units	Dry	Semi-Dry
APCr	tpa	7,800	7,500

2.3 Costs

The estimated costs associated with each option are presented in Table 2-5. In order for direct comparisons to be made, the costs are presented as annualised costs, with the capital investment and financing costs spread over a 30-year lifetime with a rate of return of 9%, using the method recommended in Technical Guidance Note EPR-H1.

Table 2-5: Costs

	Dry	Semi-Dry
Capital cost	£24,900,000	£26,100,000
Annualised capital cost	£2,420,000	£2,540,000
Maintenance	£1,245,000	£1,305,000
Reagents and residues	£5,279,000	£4,769,000
Loss of exported power	£735,000	£1,548,000
Total annualised cost	£9,679,000	£10,162,000

2.4 Conclusions

A comparison of the two options is presented in Table 2-6.

Table 2-6: Comparison table

	Units	Dry	Semi-Dry
SO ₂ abated	tpa	1,120	1,120
Photochemical Ozone Creation Potential (POCP)	t ethylene- eq pa	340	340
Global Warming Potential	t CO₂ eq pa	4,800	10,100
Additional water required in a semi-dry system	tpa	-	36,000
APC residues	tpa	7,800	7,500
Annualised cost	£ pa	£9,679,000	£10,162,000

The performance of the options is very similar.

The dry system only requires a small quantity of water for conditioning of the lime so that it is suitable for injection into the reaction chamber, whereas the semi-dry system requires the lime to be held in solution (quick lime). This requires significantly more water than a dry system.

The dry system has a lower global warming potential and annualised cost compared to the semi-dry system. In addition, within a semi-dry system recycling of reagent within the process is not proven, but it is proven in a dry system.

Due to the lower water consumption and global warming potential, and the proven capability for recycling of reagents, the dry system is considered to represent BAT for the Facility.

3 Nitrogen oxides abatement

3.1 Options considered

Three options have been considered for NOx abatement as follows:

- 1. Selective Catalytic Reduction (SCR), which involves the injection of ammonia solution or urea into the flue gases immediately upstream of a reactor vessel containing layers of catalyst.
- 2. Selective Non-Catalytic Reduction (SNCR), which involves the injection of ammonia solution or urea into the combustion chamber.
- 3. SNCR in combination with flue gas recirculation (SNCR+FGR).

3.2 Environmental performance

3.2.1 Emissions to air

The emission rates for nitrogen oxides, nitrous oxide and ammonia are shown in Table 3-1 together with the tonnages of nitrogen oxides abated.

Table 3-1: Air emissions

	Units	SNCR	SCR	FGR + SNCR
Nitrous oxide	mg/m³	10	10	10
Ammonia	mg/m³	10	10	10
NO _x , unabated concentration	mg/m³	350	350	315
NO _x , unabated rate	tpa	870	870	780
NO _x , abated concentration	mg/m³	100	80	100
NO _x released after abatement	tpa	240	190	240
NO _x removed	tpa	620	670	530

The emission rates for nitrogen oxides and ammonia are shown in Table 3-1.

A long-term abated emission concentration of 80 mg/Nm³ (11% reference oxygen content) is used for SCR for the purposes of this BAT assessment, since this is the level that the technology can achieve on a long-term basis. The two SNCR systems, with and without Flue Gas Recirculation (FGR), would be required to achieve an emission limit of 100 mg/Nm³, in accordance with the proposed emission limits for the Facility.

The unabated emission with FGR is assumed to be 10% lower than the other two cases.

The tonnages of nitrogen oxides removed by the abatement options are also shown.

The impact of emissions to air is considered in detail within the Air Quality Assessment, presented in Appendix E of the Supporting Information. Table 3-2 shows the predicted ground level concentrations for the two options.

Table 3-2: Air emissions

Abatement system:		SNCR	SCR	SNCR + FGR
Long term	·		·	
Process Contribution (PC)	μg/m³	1.48	1.18	1.48
Background	μg/m³	19.20	19.20	19.20
Predicted Environmental Contribution (PEC)	μg/m³	20.68	20.38	20.68
Air Quality Objective	μg/m³	40	40	40
PC as % of AQO		3.70%	2.96%	3.70%
PEC as % of AQO		51.70%	50.96%	51.70%
Short term			·	
Process Contribution (PC)	μg/m³	9.96	7.97	9.96
Background	μg/m³	38.40	38.40	38.40
Predicted Environmental Contribution (PEC)	μg/m³	48.36	46.37	48.36
Air quality objective	μg/m³	200	200	200
PC as % of AQO		4.98%	3.98%	4.98%
PEC as % of AQO		24.18%	23.18%	24.18%

The short term air quality impacts associated with all three NOx abatement options cannot be screened as insignificant. Whilst the long term air quality impacts cannot be screened as insignificant, they can be described as 'not significant' when existing background concentrations are taken into consideration.

It can be seen that using SCR reduces the long-term PEC by 0.74% of the air quality objective and the short-term PEC by 1.00% of the air quality objective when compared to either SNCR or SNCR + FGR.

3.2.2 Deposition to land

The impact of nitrogen deposition on sensitive habitats has been assessed in the Air Quality Assessment presented in Appendix E of the Supporting Information. As can be explained within the assessment:

- The PC at each European and UK Designated Site is less than 1% of the Critical Load and can be screened out as 'insignificant', with the exception of nitrogen deposition on coastal sand dune habitats and saltmarsh habitats within the Teesmouth and Cleveland Coast SPA/Ramsar.
- Nitrogen deposition on coastal sand dunes only slightly exceeds 1% of the Critical Load at 1.12%
 The significance of effect of nitrogen deposition on coastal sand dune habitats within the
 Teesmouth and Cleveland Coast SPA/Ramsar has been assessed in further detail in the Habitats
 Regulations Assessment refer to Appendix E of the EP Application. This has concluded that the
 effects of nitrogen deposition will not result in adverse impacts on sand dune habitat.
- nitrogen deposition on coastal sand dunes slightly exceeds 1% of the Critical Load at 1.12%.

The significance of effect of nitrogen deposition has been assessed by the project ecologists within the Habitats Risk Assessment. This has concluded that the effects of nitrogen deposition will not



result in adverse impacts on sand dune habitat. This is provided within Appendix E of the Application Pack.

3.2.3 Emissions to water

There are no emissions to water from any of the NO_x abatement systems.

3.2.4 Photochemical Ozone Creation Potential

Nitrogen dioxide has a photochemical ozone creation potential (POCP) of 2.8 and nitrogen oxide has a POCP of - 42.7. Assuming that 10% of NO_x is released as NO_2 and the rest as NO, the POCP is - 9,200 for the SNCR options and – 7,200 for the SCR option, meaning that SCR is less favourable. This is because nitrogen oxide converts to nitrogen dioxide in the atmosphere by reacting with ozone, thus removing ozone from the atmosphere. Hence, the abatement of NO actually has a negative impact on POCP.

3.2.5 Global Warming Potential

The direct emissions of greenhouse gases are the same for each option, since the carbon dioxide and nitrous oxide emission concentrations are unchanged. However, the energy consumption is different in each option, which would change the power exported from the Facility in each case. In particular, SCR imposes an additional pressure drop on the flue gases, leading to an increase in power consumption on the ID Fan. Finally, SCR requires the flue gases to be reheated which reduces the power generated by the turbine.

This means that the reduction in greenhouse gas emissions due to the displacement of power generated by other power stations would be different in each case.

In order to calculate the global warming potential of electricity consumption — assumed to be imported from the grid - the assumption of 380 kgCO₂/MWh has been used, as applied in the greenhouse gas assessment presented in Appendix E of the Supporting Information. The global warming potential is therefore calculated as follows:

Table 3-3: Global Warming Potential

	Units	SNCR	SCR	SNCR + FGR
Power consumed	kWe	480	990	640
Power not generated	kWe		760	
Change in exported power	MWh pa	3,900	14,300	5,200
GWP	t CO ₂ eq pa	1,400	5,300	1,900

3.2.6 Raw materials

The estimated consumption of raw materials for each option is shown below.

Table 3-4: Raw materials

	Units	SNCR	SCR	SNCR + FGR
Water	tpa	11,000	5,150	9,400
Ammonia	tpa	4,250	2,000	3,630



3.2.7 Waste streams

There will be no additional residues generated from any of the NO_x abatement options.

3.3 Costs

The estimated costs associated with each option are presented overleaf. In order for direct comparisons to be made, the costs are presented as annualised costs, with the capital investment and financing costs spread over a 30-year lifetime with a rate of return of 9%, using the method recommended in Technical Guidance Note EPR-H1.

Table 3-5: Costs

	SNCR	SCR	SNCR + FGR
Capital cost	£1,100,000	£16,800,000	£2,400,000
Annualised capital cost	£107,000	£1,635,000	£234,000
Maintenance	£22,000	£336,000	£48,000
Water and reagents	£494,000	£232,000	£426,000
Loss of exported power	£222,000	£815,000	£296,000
Total annualised cost	£845,000	£3,018,000	£1,004,000

3.4 Conclusions

A summary comparison of the three options is provided in Table 3-6.

Table 3-6: Comparison table

	Units	SNCR	SCR	SNCR + FGR
NO _x released after abatement	tpa	240	190	240
NO _x removed	tpa	620	670	530
Photochemical Ozone Creation Potential (POCP)	t ethylene- eq pa	-9,200	-7,200	-9,200
Global Warming Potential	t CO₂ eq pa	1,400	5,300	1,900
Ammonia used	tpa	4,250	2,000	3,630
Total annualised cost	£ pa	£845,000	£3,018,000	£1,004,000
Average cost per tonne NO _x abated	£ p.t NO _x	£1,360	£4,470	£1,890

As can be seen, incorporating SCR into the design of the Facility to abatement emissions of NOx:

- 1. increases the annualised costs by approximately £2,060,000;
- 2. abates an additional 50 tonnes of NOx per annum;
- 3. reduces the benefit of the facility in terms of the global warming potential by approximately 3,900 tonnes of CO₂;
- 4. reduces reagent consumption by approximately 2,250 tonnes per annum; and
- 5. costs an additional £3,300 per additional tonne of NOx abated compared to SNCR.



The additional costs associated with SCR are not considered to represent BAT for the Facility. On this basis, SNCR is considered to represent BAT.

Including FGR to the SNCR system to abate NOx increases the cost per tonne of NOx abated by approximately 40%. It has no effect on the direct environmental impact of the plant, but it increases the impact on climate change by approximately 500 tonnes of CO₂ per annum while reducing ammonia consumption by approximately 580 tonnes per annum.

However, this is based on the assumption that FGR reduces the NOx generation within the furnace. As explained in Section 2.6.2 of the Supporting Information submitted with the EP Permit Application, this is not necessarily the case for all furnace manufacturers. Some designs can achieve lower levels of NOx without FGR.

The proposed designs do not currently include FGR. Therefore, taking the above into consideration, the use of SNCR without FGR is considered to represent BAT for the abatement of NOx within the Facility. However, this will be subject to detailed design of the Facility.

4 Reagent selection

4.1 Options considered

We have not considered reagents for wet scrubbing, as this is not considered to be a suitable technique as explained in section 2.1. Therefore, this assessment has only considered the two alternative reagents for a dry system – lime and sodium bicarbonate.

4.2 Environmental performance

4.2.1 Emissions to air

There is no change in emissions to atmosphere between the two reagents. Both would achieve the same level of abatement.

4.2.2 Deposition to land

Again, there is no change between the two reagents.

4.2.3 Emissions to water

There are no emissions to water associated with either of the two reagents.

4.2.4 Photochemical Ozone Creation Potential

There would be no change to POCP for either system.

4.2.5 Global Warming Potential

Sodium bicarbonate has a higher optimum reaction temperature than lime, which means that less heat can be recovered in the boiler. However, this can be resolved by recovering additional heat after the acid gas abatement system. Therefore, it has been assumed that there is no impact on global warming potential from this operational difference.

The reaction of hydrogen chloride and sulphur dioxide with sodium bicarbonate results in an emission of CO_2 whereas the reaction with lime does not.

4.2.6 Raw materials

Sodium bicarbonate (NaHCO $_3$) has better solid handling properties and a significantly lower stoichiometric ratio than hydrated lime (Ca(OH) $_2$).

NaHCO₃ and Ca(OH)₂ react with the acid gases to produce alkaline salts as the following equations illustrate:

$$NaHCO_{3(s)} + HCI_{(g)} \rightarrow NaCI_{(s)} + H_2O_{(g)} + CO_{2(g)}$$
 (eqn. 1)

$$Ca(OH)_{2(s)} + 2 HCI_{(g)} \rightarrow CaCI_{2(s)} + 2 H_2O_{(g)}$$
 (eqn. 2)



In order to promote the reactions above, excess quantities of sodium bicarbonate or lime will be required. The excess reagent is lost in the residue. The ratio between the quantity of reagent supplied and the minimum required for the reaction is called the "stoichiometric ratio".

For sodium bicarbonate, a stoichiometric ratio of 1.30 is required, whereas for lime, a stoichiometric ratio of 1.80 is required. This initially appears to be economically advantageous for sodium bicarbonate in comparison to lime. However, due to the higher relative molecular weight, and the fewer molecules of acid gas reacting per molecule of NaHCO₃, the overall consumption of sodium bicarbonate is actually 64% higher than Ca(OH)₂ on a mass basis.

The reagent required to abate one kmol of HCl was calculated as approximately 109 kg of sodium bicarbonate and approximately 67 kg of lime.

4.2.7 Waste streams

The stoichiometric ratio indicates that the amount of residue will be higher with the lime option. However, due to the differences in relative molecular weight and the number of acid gas molecules reacting with each absorbent molecule, the lime system produces a similar amount of residue to the sodium bicarbonate option.

The residue production rate for abatement of one kmol of HCl was calculated as approximately 84 kg for sodium bicarbonate and approximately 85 kg for lime.

Furthermore, there are limited waste disposal options for sodium bicarbonate based APCr.

4.3 Costs

There is little difference in capital cost between the two reagents.

The raw material cost of sodium bicarbonate is significantly higher than lime, with bicarbonate costing almost 63% more than lime per tonne. This makes sodium bicarbonate an uneconomic option in comparison to lime.

The cost of disposing of the residue must also be considered due to the differences in quantity. Sodium based residues are more difficult to stabilise than lime residues; it has been assumed that the cost per tonne to landfill of sodium-based residues is 20% higher than lime residues, giving a disposal cost for sodium bicarbonate of £150/tn.

The operating costs for the two options are compared in Table 4-1, for a stoichiometric ratio of 1.8 for lime and 1.3 for sodium bicarbonate, on the basis of the abatement of one kmol of HCl:

Table 4-1: Costs per unit HCl abated

Item	Unit	NaHCO ₃	Ca(OH) ₂
Mass of reagent required	kg/kmol	109.0	67.0
Mass of residue generated	kg/kmol	84.0	85.0
Cost of reagent	£/tonne	155	110
Cost of residue disposal ¹	£/tonne	186	155
Overall Cost	£/op. hr/kmol	32.5	20.5
Ratio of costs	-	1.58	-

¹The figure shown does not include landfill tax.

01 July 2024 S3181-0410-0006SDR



4.4 Conclusions

There is a small environmental benefit for using sodium bicarbonate, in that the mass of residues produced is smaller. However, there are a number of significant disadvantages:

- the residue has a higher leaching ability than lime-based residue, which will limit the disposal options;
- the reaction temperature doesn't match as well with the optimum adsorption temperature for carbon, which is dosed at the same time;
- the sodium bicarbonate system has a slightly higher global warming potential due to the reaction chemistry; and
- the overall cost per kmol of reagent required to abate HCl is almost 58% higher.

Hence, the use of lime is considered to represent BAT for the Facility.

5 Combustion techniques

5.1 Options considered

The available techniques for waste combustion have been reviewed in section 2.6.1 of the supporting information. The assessment has been expanded to provide a cost-benefit analysis of moving grates and fluidised beds.

- 1. Moving grates are an established technology in the UK and Europe for the combustion of high net calorific value fuels, such as those proposed to be processed. The grate turns and mixes the waste along its surface to ensure that all waste is exposed to the combustion process.
- 2. Fluidised beds are designed for the combustion of relatively homogeneous waste. The feed of incoming waste would be required to be pre-treated to produce a fuel for processing in a fluidised bed combustion system.

5.2 Environmental performance

5.2.1 Emissions to air

The emissions to atmosphere would not be affected by the choice of combustion technology. Although NO_x concentrations from the furnaces would be different, both options would require further abatement to achieve the necessary emission limits. This means that the actual effect would be to change the amount of reagent required to abate the NO_x . This is considered in a later section.

Table 5-1: NO_x emissions

Option	NO _x emissions from furnace [mg/Nm ³]
Moving grate	320-380 ⁽¹⁾
Fluidised bed	250-300 ⁽¹⁾

⁽¹⁾ Presented at 11% oxygen with standard reference conditions

5.2.2 Deposition to land

Deposition from atmospheric emissions would be unchanged.

5.2.3 Emissions to water

There are no emissions to water for either system.

5.2.4 Photochemical Ozone Creation Potential

There would be no change to POCP for either system.

5.2.5 Global Warming Potential

The direct emissions of carbon dioxide are the same for each option. However, whilst fluidised beds have lower emissions of nitrogen dioxide they can have elevated emissions of nitrous oxide. Nitrous oxide is a greenhouse gas with a global warming potential (GWP) nearly 300 times that of carbon dioxide. Fluidised beds can be designed to minimise the formation of nitrous oxide. For the



purposes of this assessment we have assumed that the fluidised bed has been well-designed and the emissions of nitrous oxide are slightly elevated and are released at a concentration of 10 mg/Nm³.

A fluidised bed plant has a higher parasitic load than a moving grate system due to the sand system and fly ash separation system. The additional parasitic load in the case of the fluidised bed option has been estimated at 10%.

This means that the reduction in greenhouse gas emissions due to the displacement of power generated by other power stations would be different in each case.

In order to calculate the global warming potential of electricity consumption — assumed to be imported from the grid - the assumption of 380 kgCO₂/MWh has been used, as applied in the greenhouse gas assessment presented in Appendix E of the Supporting Information. The global warming potential is therefore calculated as follows:

The results are presented in Table 5-2. In each case the overall GWP is less than zero, as there is a net reduction due to displacement of primarily fossil fuel power generation. Thus, the more negative figure produced by the grate is better.

Table 5-2: Global Warming Potential

		Grate	Fluidised bed
Power generated	MWh pa	380,000	380,000
Parasitic load	MWh pa	38,000	42,000
GWP	t CO2 eq pa	-126,900	-125,400

5.2.6 Raw materials

The estimated consumption of raw materials for each option is shown in Table 5-3.

Table 5-3: Raw materials

	Units	Grate	Fluidised bed
Ammonia	tpa	4,300	3,500
Sand	tpa	-	4,580

5.2.7 Waste streams

The three options produce several solid waste streams.

- It is assumed that most metals within the waste will have been removed during any pretreatment of the incoming waste. Therefore, it is assumed that this will be identical for both options and has not been considered further.
- The fluidised bed will produce more non-hazardous ash than a grate due to the addition of sand within the boiler which is used as a fluidising medium. The non-hazardous ash will include bottom ash and boiler ash. The boiler ash is removed in a cyclone before the acid gas abatement reagent is added. The non-hazardous ash could be usable for building aggregate, but this is not certain. For the purposes of this assessment it has been assumed that the non-hazardous ash cannot be used as a building aggregate and requires disposal in a non-hazardous landfill.
- Both options produce APC residues. For the purposes of this assessment it is assumed that both options will generate comparable quantities of APC residue.

Estimated figures are presented in Table 5-4.

Table 5-4: Waste streams

	Units	Grate	Fluidised bed
Dattam ach			
Bottom ash	tpa	99,444	37,724
Boiler ash	tpa	-	66,300
APC residues	tpa	16,845	16,845
Total ash	tpa	116,289	120,869

The Fluidised Bed will produce a slightly higher quantity of waste compared to the grate due to the losses of sand which are used within the furnace for the fluidised bed.

5.3 Costs

The estimated costs associated with each option are presented below.

Fluidised bed technology is typically up to around 6% more expensive than a grate, due to the additional waste screening equipment, sand dosing and recycling equipment, and fly ash separation. At the time of writing this assessment, capital costs are not readily available for the two options. Therefore, it has not been possible to consider the capital costs for the available technologies within this assessment.

Similarly, although fluidised beds typically have significantly higher maintenance costs than grate systems, maintenance costs are not readily available for the different options, so these were not considered in this assessment.

Table 5-5: Annual material costs and revenues

	Grate	Fluidised bed
Reagents	£490,000	£860,000
Residue Disposal	£5,730,000	£5,800,000
Annual Reagent and Residue Costs (Materials)	£6,220,000	£6,660,000
Annual Power Revenue	£19,494,000	£19,226,000

As presented in Table 5-5, the fluidised bed option has slightly higher costs associated with the purchase of reagents and the disposal of residues, assuming that the costs for treatment and reuse of fly ash are similar to those for bottom ash.

The parasitic load associated with fuel preparation has been excluded from the assessment, as it is assumed to be comparable across all three combustion technologies.

For a fluidised bed there may be costs associated with screening the incoming waste to ensure that there are no contaminants which could affect the operation of the fluidised bed. These costs have not been accounted for within Table 5-5.



5.4 Conclusions

Table 5-6 provides a summary comparison of the two options.

Table 5-6: Option comparison summary

		Grate	Fluidised bed
Global Warming Potential	t CO2 eq pa	-126,900	-125,400
Ammonia consumption	tpa	4,300	3,500
Total ash	tpa	116,289	120,869
Annual total materials costs (reagents and residues)		£6,220,000	£6,660,000
Annual power revenue		£19,494,000	£19,226,000

The combustion technologies will produce similar quantities of residue, although the fluidised bed produces more residue due to the losses of sand from the furnace.

The material costs are approximately 7% higher for the fluidised bed than the grate, whereas the grate system will have a slightly higher power revenue. It is acknowledged that it is marginal. The grate system will be able to process the varying waste composition compared to a fluidised bed system which requires a consistent and homogenous fuel and therefore requiring additional treatment of the waste.

As stated within the qualitative BAT assessment (refer to section 2.6 of the Supporting Information) grate combustion systems are designed for large quantities of heterogenous waste, whereas fluidised bed systems are more sensitive to inconsistencies within the fuel. Due to the robustness of grate combustion systems, they are considered to represent BAT for the Facility.

ENGINEERING - CONSULTING

FICHTNER

Consulting Engineers Limited

Kingsgate (Floor 3), Wellington Road North, Stockport, Cheshire, SK4 1LW, United Kingdom

> t: +44 (0)161 476 0032 f: +44 (0)161 474 0618

www.fichtner.co.uk