



Hendrikson & Ko



Baltic Actions for Reduction of Pollution of the Baltic Sea from Priority Hazardous Substances

Actions 5 and 6

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Introduction

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- Action 6: Pilot permits
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Action 5

Permit guideline elaboration and stakeholders' capacity building for increased quality of permits (preparatory)

- Aim: Better define legal duties and to draft technical guidelines on a site specific assessment of integrated pollution prevention and control options with regard to substances of particular environmental concern. Includes topic how to prevent environmentally hazardous substances to be discharged into the public sewer system.
- Duration: April to November 2009, amendments after July 2010 (inputs from Action 6) and after June 2011 (input from Action 3.4, 6)
- Activities and time-table: a) expert work from April to October 2009, linked with b) workgroup meetings from April to November 2009 with national competent authorities; 2 meetings held at each country, a' 10-15 participants; c) amendments up to 2011
- Target groups: companies, permitting authorities, inspectorates
- Involved partners: Latvian and Lithuanian permitting authorities as experts and dialogue partners; BEF Est, Lat, Lit coordinate and assist in implementation





Action 5 (continued)

- Deliverables and results:

Guidance document consisting of the following topics:

- Reference list of substances of high environmental concern
- Identification of hazardous substances in raw materials and their potential occurrence in effluents
- Duty to carry out investigation
- Assessing implementation of BAT by the permitting authorities
- Non-IPPC permits and discharges into the public sewage system
- Obligations of different actors: what they must and should do with hazardous substances, hints and tools on how that could be done

- Detailed timetable: to be agreed with partners (proposal in EXCEL)

- Linkage with COHIBA: Work Package 5-5 on identifying management measures and options for the selected hazardous substances with regard to both process- and product controls including economic effects; September 2010 (use of BAT and best practice), March 2011 (draft HELCOM guidances), September 2011 (recommended management options); package 6-5.2: similar technical guidance foreseen





Action 6

Pilot permit elaboration (implementation)

- Aim: Test out the results of action 5 in practice. Real steps towards reduction of the uses of certain hazardous substances by applying strict and detailed measures at plant level.
- Duration: Autumn 2009 to 2011
- Activities and deliverables:
 - 6.1. Full scale elaboration of new permit applications for the partner enterprises. Scope of the task involves IPPC permits, wastewater discharge permits, and also cases where permit holder is an operator of municipal sewer and an installation has discharges to the municipal sewer by contract with the operator (the case for Estonian partners B4, B5, B6). Both application stage and permit stage are considered, e.g. amount of information given in application on chemicals in use, description of substitution options, relevance of reflecting chemicals' use data in permit, setting specific permit conditions. Permit applications will be elaborated and updated during 2009 - 2011 – exact timelines for each partner depending on the dates for permit re-application of the partners





Action 6 (continued)

- Activities (2):
 - 6.2. National experience exchange: up to 2 **working group meetings** among the involved stakeholders to feedback the progress and jointly look for solutions for difficult cases. The meetings take place during autumn 2009-April 2010.
 - 6.3. Present the guidance document developed in action 5 and give **training** how to work with it. Programme also contains sessions on how REACH can be used as tool for permitting authorities and enforcement authorities in future. The training for inspections shall contain also sessions where the permit requirements will be discussed versus detection mechanisms for permit violations and test inspections will be agreed among the participants as home works. For each country 3 training courses for different groups will be held, each with ca. 30-50 participants each.
 - Furthermore 3 **info days** in different regions of each country will be held for industries to get informed about the hazard concept and requirements in their permits. The info days will be carried out back to back with action 3.4 investigations at these regions. Trainings and info days will be performed during May-July 2010.





Action 6 (continued)

- Target groups:
 - 6.1 and 6.2. Companies, permitting authorities, consultants;
 - 6.3: Companies, permitting authorities, consultants, controlling authorities
- Involved partners: BEF Est, Lat, Lit will be experts in permit writing in cooperation with enterprises B4, B5, B6, B10, B11, B17, B18, B19. Latvian and Lithuanian permitting authorities will give content input and participate in meetings. Estonian authorities are also involved.
- Detailed timetable: to be agreed with partners
- Expected results:
 - 5-7 new permit applications elaborated and ready for approval or partly approved
 - 2 national working group meetings held, ca 15-20 persons participated in each
 - In the training courses in each country 100-120 persons will be trained (permitting authorities, inspectors, experts writing the permits), ca 130-150 industrial enterprises will have participated in info days in the countries
- Linkage with COHIBA: no standalone input

