



## **2013 EMISSIONS** FROM CURRENTLY **OPERATING PLANTS**

**S0**<sub>2</sub> 400mg/Nm<sup>3</sup> NO<sub>x</sub> 500mg/Nm<sup>3</sup> DUST 50mg/Nm<sup>3</sup>

1,530 PREMATURE DEATHS

1.050 CASES OF CHRONIC BRONCHITIS (ADULTS)

532.570 WORK DAYS LOST

48.430 ASTHMA SYMPTOM DAYS (CHILDREN)

€4.330m TOTAL HEALTH COSTS (MILLION EUROS) (VSL. HIGH VALUE) 2013 PRICES

2016 IED **LIMITS** 

**S02** 200mg/Nm<sup>3</sup> NO<sub>x</sub> 200mg/Nm<sup>3</sup> DUST 20mg/Nm<sup>3</sup>

530 商 PREMATURE DEATHS

370 CASES OF CHRONIC BRONCHITIS (ADULTS)

180.560 WORK DAYS LOST

16,940 **ASTHMA SYMPTOM** DAYS (CHILDREN)

€1.510m

TOTAL HEALTH COSTS (MILLION EUROS) (VSL. HIGH VALUE) 2013 PRICES

PROPOSED BREF **LIMITS** 

**S0**<sub>2</sub> 130mg/Nm<sup>3</sup> **NO<sub>x</sub>** 175(L)/150(HC) mg/Nm<sup>3</sup> DUST 8mg/Nm<sup>3</sup>

360 PREMATURE DEATHS

**250** CASES OF CHRONIC BRONCHITIS (ADULTS)

120.070 WORK DAYS LOST

11.640 **ASTHMA SYMPTOM** DAYS (CHILDREN)

**€1.022**m TOTAL HEALTH COSTS (MILLION EUROS)

(VSL. HIGH VALUE) 2013 PRICES

**BEST AVAILABLE TECHNIQUES (BAT)** 

**SO**<sub>2</sub> 10mg/Nm<sup>3</sup>  $NO_X < 85(L)/65(HC) \text{ mg/Nm}^3$ DUST 2mg/Nm<sup>3</sup>

60 南 PREMATURE DEATHS

**50** CASES OF CHRONIC BRONCHITIS (ADULTS)

14,970 WORK DAYS LOST

2,350 ASTHMA SYMPTOM DAYS (CHILDREN)

€180m TOTAL HEALTH COSTS (MILLION EUROS) (VSL, HIGH VALUE)

2013 PRICES

## TABLE DEROGATIONS OVERVIEW (SPAIN)

2013 Currently operating plants
IED 2016 IED limits
BREF Proposed BREF limits
BAT Best Available Techniques

DR Desulphurisation RateLLD Limited LifetimeSIS Small isolated systemsTNP Transitional National Plan

COUNTRY / Plant name	Coal type	MWel	PREMATURE DEATHS				Derogation
			2013	IED	BREF	BAT	
SPAIN							
Litoral	Hard coal	1,012	177	71	47	8	TNP
Abono	Hard coal	848	140	92	61	10	TNP
Puente Nuevo	Hard coal	298	16	8	5	1	TNP
Lada	Hard coal	472	32	18	12	2	TNP
La Robla	Hard coal	570	57	21	14	2	TNP
Los Barrios	Hard coal	570	51	34	23	4	TNP
Meirama	Lignite	509	90	34	24	5	TNP
Soto de Ribera	Hard coal	628	46	14	10	2	TNP
Anllares	Hard coal	336	110	11	7	1	LLD
Compostilla II	Hard coal	1,098	131	32	22	4	TNP
Alcudia II	Hard coal	469	83	34	23	4	SIS
Narcea	Hard coal	547	27	12	8	1	TNP
Velilla	Hard coal	458	38	13	9	1	TNP
Andorra	Lignite	966	398	49	34	6	TNP / DR
As Pontes	Lignite	1,403	134	89	61	12	TNP
TOTAL		10,184	1,530				•

All of the 15 Spanish coal plants are making use of 'derogations'. This corresponds to 100% of its total coal generation capacity and 1,530 premature deaths.

Spain had a high share of coal and lignite plants in previous derogation systems, such as opt-out derogations and the National Emission Reduction Plan, which ended in 2016.

Out of the 15 coal-fired LCPs, the **Spanish TNP** lists 13 coal-fired LCP (three of which are lignite fired). This will delay the introduction of the IED limits until mid-2020. The following extra pollution could be prevented each year if coal plants were withdrawn from the TNP:

## **TABLE POLLUTION LIMITS (SPAIN)**

POLLUTANT (in tonnes)	2013 emissions (same plants)	Derogations allow pollution up to	Maximum pollution under 2016 IED limits	Extra pollution allowed each year	TOTAL extra coal pollution allowed due to TNP (2016-Mid 2020)
SO <sub>2</sub>	73,551	106,477	45,109	61,368	276,156
NO <sub>X</sub>	66,313	73,892	39,047	34,845	156,803
Dust	3,210	9,905	3,951	5,954	26,793

## GENERAL ASSESSMENT OF POSITION TAKEN IN RELATION TO COAL IN LCP BREF REVIEW RELATING TO COAL:

The Spanish authorities (MAGRAMA) have been actively seeking to downgrade the ambition level on hardcoal standards. They argued in favour of relaxing all parameters and introducing loopholes that would affect the operation of hardcoal and lignite plants. Spain also

proposed that its coal and lignite plants which do not even meet the IED limits should be listed as "BAT candidates". Spain opposed, in particular, any mercury limit and its continuous monitoring, asked for relaxed limits for dust emission levels and opposed a strengthening of the NO<sub>x</sub> level for hardcoal plants.









