

12<sup>th</sup> April 2016

## INFORMATION REGARDING SMALL WASTE OIL BURNERS (SWOBS)

On the 18th July 2011 Thermobile UK Ltd were made aware that The Department for Environment Food and Rural Affairs (Defra) were conducting a review of guidance on the implementation of the European Union Waste Incineration Directive (WID), now the Industrial Emissions Directive (IED), and it's application to small waste oil burners (SWOBS) in England and Wales.

Thermobile attended meetings at Defra on 10th August 2011 and 4<sup>th</sup> November 2011 together with representatives of the Garage Equipment Association (GEA), the Retail Motor Industry Federation (RMI) and the Oil Firing Technical Association (OFTEC).

SWOBS were exempt from WID since it's inception in 2000 as the UK produced guidance which took the view that small waste oil burners lacked the technical specification to amount to "incineration plant" for the purposes of the Directive.

Manufacturers of SWOBS, the GEA, RMI, OFTEC and other trade organisations fought the case for current and potential operators of SWOBS as to the benefits of burning waste oil on site at the point of it's arising as against that of being transported, recycled and sold back to the end user at great profit to the oil recycling companies.

The initiative rails against the logic of the obvious sensible carbon footprint of burning waste oil on site and reducing the operator's heating bills in these difficult economic times.

Further to this statement by Defra, Thermobile commissioned a Carbon Footprint "cradle to grave" report for Waste Oil versus Processed Fuel Oil and Virgin Oil which was presented to Defra.

Thermobile is the only manufacturer of Waste Oil Fired Heaters to have been involved in discussions with Defra for the past 25 years concerning the use of waste oil as a means of workshop heating and the ONLY Company to spend a large sum on the Carbon Footprint study.

On the 14<sup>th</sup> September 2015 Thermobile received notification from Defra that on the 16<sup>th</sup> July 2015 the Parliamentary Under Secretary of State for Environment and Rural Affairs, Rory Stewart, announced that as part of commitment to cleaner air the Government would amend the current Environmental Permitting Guidance – the "Waste Incineration Directive Guidance", to state clearly that all waste incineration plants and co-incineration plants burning waste oils in England and Wales fall under the scope of Chapter IV the Industrial Emissions Directive (IED). The change effects small basic appliances such as Small Waste Oil Burners (SWOBS). A further Impact Assessment report was received a few days later.

This Guidance will be amended to advise that these units are within scope of Chapter IV of the IED, and therefore their continued use of waste oils as a fuel will require the relevant permit under Schedule 13A of the Environmental Permitting Guidance (EPR). The cost of the application is £3,218 with an annual subsistence fee of £1,384. In addition to the considerable cost, the application process is far more complex and additional requirements will be placed on emissions monitoring and operational control procedures. The change comes after the European Union Commission raised concerns that the low risk status of small waste oil burners in England and Wales was jeopardising local air quality.

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The use of SWOBS is already subject to similar severe financial and monitoring restrictions in Scotland , Northern Ireland and all other EU member states the cost of this permit would be prohibitive to end users.

We have never been presented with emission figures from a waste oil heater by Defra and as far as we know the last tests were conducted 35 years ago when the new oil had far greater metallic compounds and other impurities.

In 2011 Thermobile offered to pay for emission tests and were told not to bother by Defra as the main objective of the directive was waste, and not emissions.

The astounding admission by Defra is "There could be some emissions produced when waste oil is processed, however we have no data on this so assume these would be negligible"!!

This Processed Fuel Oil (PFO) is the main alternative fuel suggested by Defra !!!.

Defra published the amended guidance in December 2015 with amendments taking effect from 6<sup>th</sup> April 2016 which is extremely annoying as the RMI, GEA and ourselves were assured in 2011 that we would be involved in further consultation.

A meeting with Rory Stewart , the Parliamentary Under Secretary of State for Environment and Rural Affairs , took place on the 1<sup>st</sup> March 2016 attended by Andy Wallis (General Manager Thermobile UK ) , Stuart James ( RMI Independent Garages Director ) and Dave Garratt ( GEA Chief Executive ).

Rory Stewart acknowledged our concerns but explained that his primary concern with SWOBS was their potential impact on public health due to emissions. However he is prepared to look at any evidence that we can show to prove that they have got it wrong.

We pointed out again to Defra that a SWOB burning waste oil is as clean as one burning Processed Fuel Oil (PFO) but this did not carry much weight and it became obvious that Defra did not see any future in burning PFO or waste oil.

Defra commented that we will need to prove that the emissions from a SWOB burning waste oil are no more damaging than a SWOB burning heating oil (diesel).

If we could provide such evidence we would also need to convince them that the quality of the waste oil used was constant, which is obviously impossible.

Thermobile are looking into the cost of the tests involved and will liaise with the RMI and GEA as to the feasibility of such tests.

**Waste Oil heaters can still be operated on alternative fuels which do not require a licence from Defra. The units can be operated on Bio Oils including Linseed, Rapeseed other certain refined Vegetable Oils & PFO processed fuel oil.**

**The manual ignition AT Series Do Not Require any adjustment.**

**The Automatic ignition SB Series require simple adjustments to the compressed air pressure and the temperature setting of the oil pre-heating element**