




Environmental protection

Additional guidance from the Department for Environment, Food and Rural Affairs, and from the Welsh Assembly Government

AQ 1(05)

Control of mercury emissions from crematoria

1. Defra, the Welsh Assembly Government and the Scottish Executive have consulted twice on the issue of mercury emissions from crematoria (<http://www.defra.gov.uk/corporate/consult/crematoria-two/index.htm> and <http://www.defra.gov.uk/corporate/consult/crematoria/index.htm>).
2. This note makes amendments to the existing published guidance on crematoria - PG5/2(04)  (549 KB) following Ministers' decisions after careful consideration of all the consultation responses.
3. The amendments made by this note constitute statutory guidance under regulation 37 of the Pollution Prevention and Control (England and Wales) Regulations 2000, SI 1973.

Amendments - introduction

4. In accordance with the second consultation paper, 50% of all cremations at existing crematoria are to be subject to mercury abatement. However, it has been decided to allow a further year for this upgrading to be complete, so the deadline will now be 31 December 2012.
5. The Government accepts burden sharing as a flexible way of achieving these reductions, provided satisfactory evidence is supplied by 31 December 2005 that such an approach will successfully deliver the 50% objective. On this basis, all crematoria should notify their relevant local authority regulator by no later than 31 December 2005 whether they will opt for fitting abatement, or whether they will be sharing the cost of abatement fitted by other crematoria (whether or not owned by the same operator), or whether they will choose a combination of these two approaches.

The Federation of British Cremation Authorities, in association with the Cremation Society, is establishing a scheme - CAMEO* - which will enable crematorium operators to combine in order to achieve burden sharing. The scheme is being designed to spread the cost burden over the duration of the upgrading period as well as to provide the Government with data to show that the 50% objective will be met. The contact for CAMEO is: The Secretary, The Federation of British Cremation Authorities, 41 Salisbury Road, Carshalton, Surrey SM5 3HA. Email address: fbcasec@tiscali.co.uk.

(In accordance with the second consultation paper, amended guidance will be issued in the event of the failure of the burden-sharing approach.)

6. All new crematoria (as defined in PG5/2(04)) should be fitted with mercury abatement. However, in recognition that new crematoria commonly begin operation at substantially below full capacity, abatement should not be required to be in operation until the sooner of the following two dates:
 - a. the date when it is likely that, within the subsequent 12 months, more than 750 cremations will take place at the crematorium,
 - b. 31 December 2012.
7. The guidance in paragraph 6.16-6.18 of PG5/2(04) should be applied in relation to cremators where abatement is

fitted.

Amendments

Replace Table 1 with the following Table 1:

Table 1: Compliance timetable			
Relevant paragraph/row in this note	Processes affected	Provision	Compliance date
AQ1(05)	Existing crematoria	Notification in accordance with paragraph 5 of AQ1(05)	31 December 2005
AQ1(05)	Existing crematoria where abatement is to be fitted	Install mercury abatement	31 December 2012
Table 3 + paragraphs 5.17-5.19 and 6.16-6.18 (NB parts of Table 2 are superseded)	New crematoria and new or existing cremators fitted with mercury abatement	As per column 1 of this row	New crematoria - from 1 October 2006 subject to paragraph 6.8 of PG5/2(04) as amended by AQ1(05) Existing crematoria - when mercury abatement fitted and no later than 31 December 2012
Paragraph 5.7 5 th bullet	all processes	instrument reliability guideline	12 months from publication of PG5/2(04)
All other provisions	all processes	-	To be complied with as soon as practicable, which in most cases should be within 12 months of the publication of this note (ie PG5/2(04)) ¹
¹ For the change to 2 seconds uncorrected residence time, where this can be achieved without structural change, up to 12 month as appropriate. Where structural work is required, it should be at the earliest opportunity which should normally be when the cremator is next replaced.			

Replace paragraph 5.1 with

"5.1 The emission limit values and provisions described in this section are achievable using the best available techniques described in Section 6. Monitoring of emissions should be carried out according to the method specified in this section or

by an equivalent method agreed by the regulator. (See Ref. (f) (M1) and Ref. (g) (M2))

New and existing processes: Table 2 and paragraphs 5.1 - 5.16, 6.1 - 6.15 and 6.19 - 6.33 apply.

New crematoria (excluding substantial changes) and new or existing cremators with mercury abatement: Table 3 and paragraphs 5.17- 5.19, 6.16- 6.18 apply additionally, and parts of Table 2 are superseded.

The reference conditions for limits in Table 2 and Table 3 are:

- 273K, 101.3kPa, 11% oxygen v/v, dry gas unless otherwise stated"

Substitute for the words "new process(es)" which appear in the heading before paragraph 5.17, in paragraphs 5.17, 5.18 and 5.19, in table 3, and in the heading before paragraph 6.16: "new crematoria and new or existing cremators fitted with abatement".

The reference in the third column of Table 4 to mercury arrestment should be amended as follows: "Arrestment is required in the circumstances specified in paragraph 6.8".

Replace paragraph 6.8 with:

"New crematoria (see definitions in section 8) should be fitted with mercury abatement, except that abatement should not be required to be in operation until which is the sooner of the following two dates:

- a. the date when it is likely within the subsequent 12 months that more than 750 cremations will take place at the crematorium,
- b. 31 December 2012.

"Existing crematoria should be fitted with mercury abatement to the extent necessary to ensure that 50% of all cremations carried out (based on the Federation of British Cremation Authorities' 2003 cremation statistics).

a condition should be included in all permits requiring operators to notify them in accordance with paragraph 5 of AQ1 (05). If the operator is to participate in sharing rather than (or in addition to) abating, the notification should include evidence of the sharing arrangements where mercury abatement is to be fitted, following notification a condition should be included in the permit requiring that the abatement is installed and fully operational by no later than 31 December 2012. (For avoidance of doubt, if it is installed sooner than this date regulators should expect it to be operated from the earlier date.)"

AEQ/Defra

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