

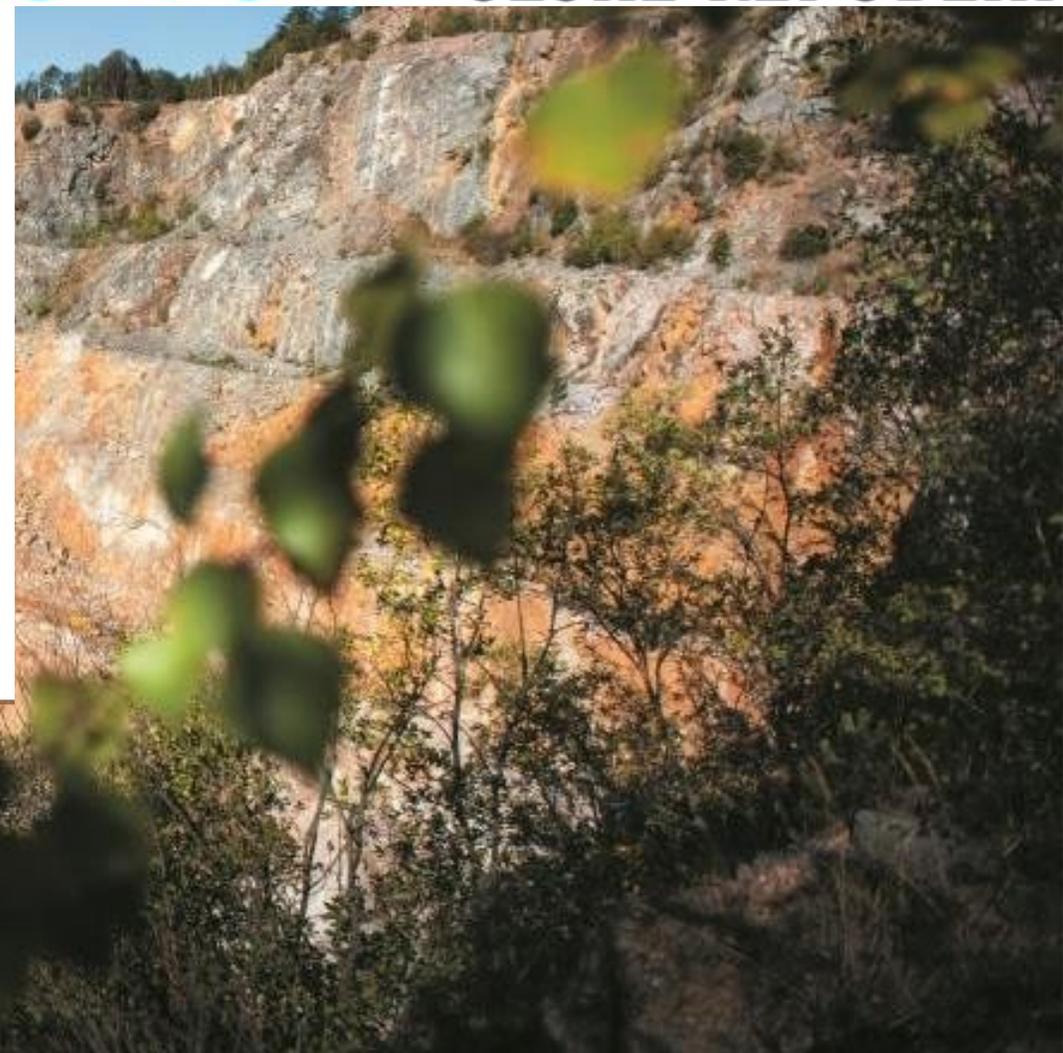


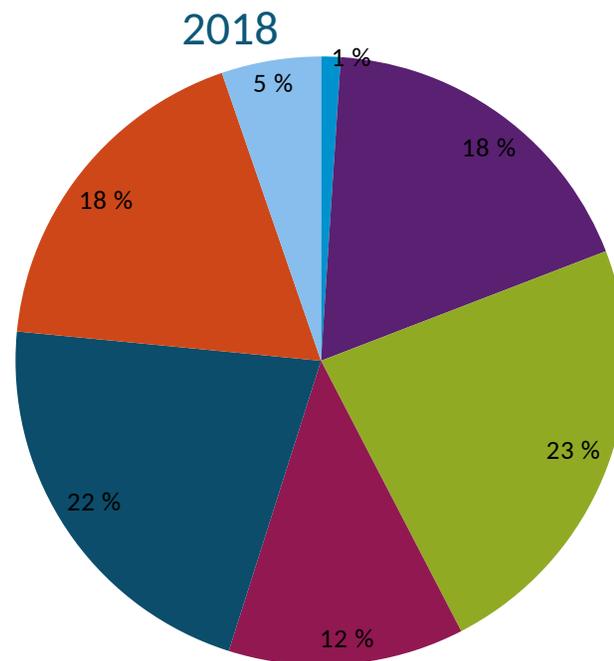
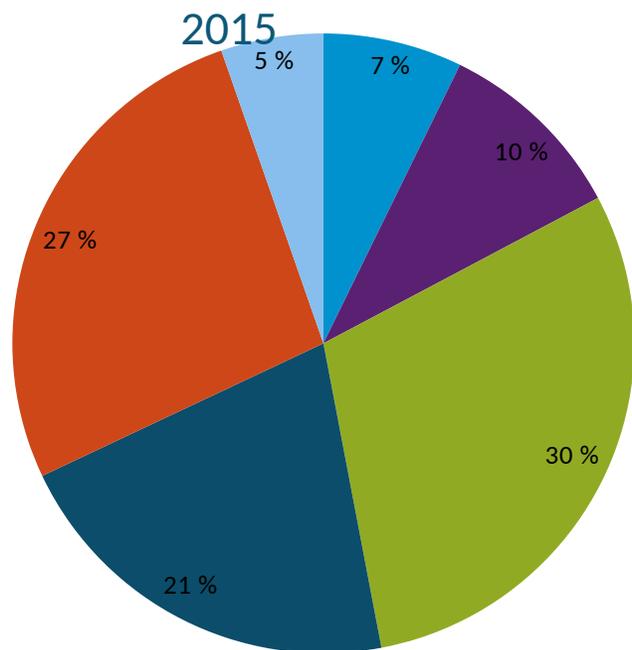
SVAZ VÝROBCŮ
VÁPNA
ČESKÉ REPUBLIKY

STÁVAJÍCÍ PALIVOVÝ MIX A PLNĚNÍ EMISNÍCH LIMITŮ V ČR

VÁPNO, CEMENT, EKOLOGIE

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Červen 2019





Nárůst využití koksu na úkor antracitu
Nárůst využití lignitu na úkor č. uhlí a kapalných paliv

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm ³ | BAT AEL mg/Nm ² | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|----------------|---------------------|--|----------------------------|---|--|----------------------------------|---|--|
| PRK | Black coal+SAF | b Fabric Filter | 30 | 10 | 10 | yes | Continuous Monitoring | Increasing the frequency of hose control and shortening hose replacement time | Rapidly increasing costs due to more frequent replacement of filter hose |

NOx

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm ³ | BAT AEL mg/ Nm ² | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|-------------------------------------|---|--|------------------------------|---|--|----------------------------------|---|--|
| PFRK | natural gas recycled oil black coal | II Process optimisation including flame shaping and temperature profile | 1000 | 100 -350 PFRK/ASK/MF SK/ OSK | 500 | YES | Continuous | Complies with BAT (3) Where primary techniques as indicated in BAT 45 (a) are not sufficient to reach this level and where secondary techniques are not applicable to reduce the NOx emissions to 350 mg/Nm ³ , the upper level is 500 mg/Nm ³ , especially for hard burned lime and for the use of biomass as fuel. | Affection of optimized process resulting in higher CO emissions or needed of additional treating |
| PRK | Black coal+SAF | III Burner Design (low NOX) | 800 | <200-500 LRK/PRK | 500 | yes | Continuous Monitoring | | Further decreasing of the emission limit will no longer be achievable without significant investment |

SOx

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm3 | BAT AEL mg/ Nm ² | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|-------------------|------------------------|--|---------------------------------|---|--|----------------------------------|--|---|
| MFSK | Natural Gas, coke | 1 Process optimisation | 2500-coke | <50 -200 PFRK/ASK/MFSK/ OSK/PRK | 200 | YES | Annual | low content fuels | |
| MFSK | coke/ anthracite | 2 low sulphur fuels | 1500 | <50 -200 PFRK/ASK/MFSK/ OSK/PRK | 200 | YES | Annual | The compliance achieved with low sulphur fuel only | Lower ELV would not be achievable at this kiln type |

CO

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm3 | BAT AEL mg/ Nm ² | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|-------------------------------------|------------------------|--|-----------------------------|---|--|----------------------------------|-------------------|--|
| PFRK | natural gas recycled oil black coal | b process optimisation | Not required | <500 PFRK OSK LRK PRK | 500 | YES | Annual | Complies with BAT | Affection of optimized process resulting in higher NOx emissions |

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm3 | BAT AEL mg/ Nm ² | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|---------------------|----------------------|--|-----------------------------|---|--|----------------------------------|---|---|
| MFSK | coke/ anthracite | a primary techniques | Not Required | <30 ASK MFSK 2 PFRK2 | 30 | YES | Annual | Limit achievable only using coke not anthracite | |

HCl, HF

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm3 | BAT AEL mg/ Nm ² | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|----------------|--|--|-----------------------------|---|--|----------------------------------|---|---|
| PRK | Black coal+SAF | b limiting chlorine and fluorine in wastes | HCL 10 HF 1 | HCL < 10 HF <1 | HCL 10 HF 1 | YES | Continuous Monitoring | This emission limit would not be achievable without additional flue-gas treatment | |
| MFSK | | | Not Required | HCL < 10 HF <1 | not required | | not required | No Requirement in Permit | only for waste |

PCDD/F

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF ng/ Nm3 | BAT AEL <0.05-0.1 ng | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|---------------------|--|--|----------------------|---|--|----------------------------------|--|--|
| PRK | Black coal+SAF | a low chlorine content b copper in fuel c residence time flue gas oxygen content 300-459 C | 0,1 | <0.05-0.1 | 0,1 | YES | twice a year | | Further decreasing of the emission limit will no longer be achievable without significant investment |
| MFSK | Natural Gas,coke | a low chlorine content b copper in fuel c residence time flue gas oxygen content 300-459 C | Not Required | <0.05-0.1 | 0,1 | YES | annual | Protocol in place to reduce testing | |
| MFSK | coke/ anthracite | a low chlorine content b copper in fuel c residence time flue gas oxygen content 300-459 C | Not Required | <0.05-0.1 | 0,1 | YES | Annual | Only achievable with some type of fuel, with another not. The relationships are not clear. | |

Metal

| Kiln Type | Fuel Type | Abatement Technique | What was the value in the permit before BAT-AEL from the lime BREF mg/ Nm3 | BAT AEL mg | Actual ELV in Installation Permit mg/ Nm ³ | Achieves compliance with ELV in Permit | Monitoring Frequency From Permit | Comment | Potential threat in the upcoming revision |
|-----------|-----------|---------------------|--|------------|---|--|----------------------------------|-------------|---|
| | | | | | | | | No comments | |

Footnotes in BAT Conclusions Document

What did really help you

- NOX: (2) U dlouhé rotační pece a rotační pece s předeříváčem s šachtou na výrobu tvrdě páleného vápna je horní úroveň 800 mg/Nm³.
- NOx: (3) Pokud nejsou primární techniky uvedené v BAT 45 a) I dostačující a pokud nejsou k dispozici sekundární techniky ke snížení emisí NO x na 350 mg/Nm³ , je horní úroveň 500 mg/Nm³, zejména pro tvrdě pálené vápno a při použití biomasy jako paliva.
- CO: (2) BAT-AEL neplatí pro šachtové pece se smíšenou vsázkou (MFSK) a prstencové šachtové pece (ASK).
- TOC: (2) Ve výjimečných případech může být úroveň vyšší.

What footnote needs to be improved/corrected for the future revision

- NOx: (2) U dlouhé rotační pece a rotační pece s předeříváčem s šachtou na výrobu tvrdě páleného vápna je horní úroveň 800 mg/Nm³. Pokud by se zahrnuly i PFRK, bylo by to perfektní
- CO, (1):): Emise mohou být vyšší v závislosti na použitých surovinách a/nebo druhu vyráběného vápna, např. hydraulického vápna. Poznámka je velice obecná, tzn. že ve skutečnosti není pro úředníka uchopitelná. Kdyby se poznámka více konkretizovala, mohla by být v praxi více použitelná.

Wish list

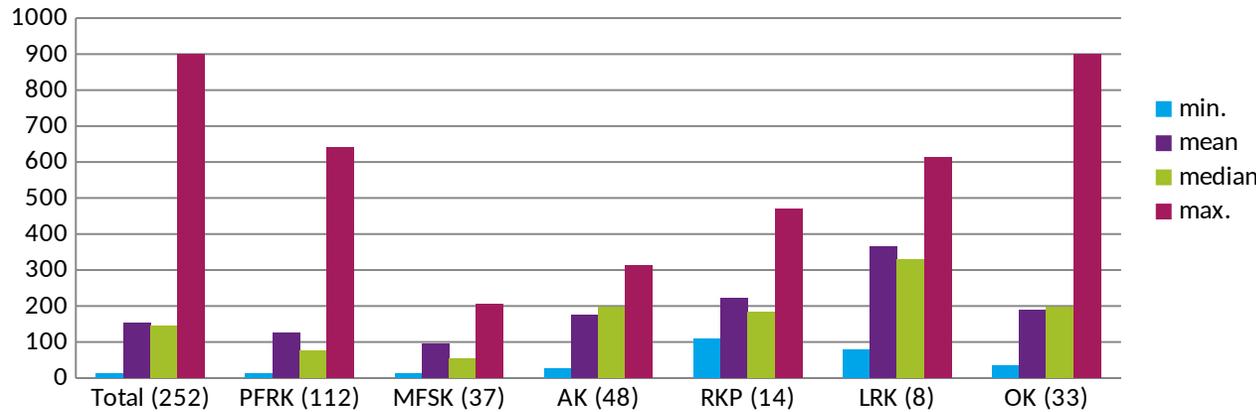
- 1.3.2. c) to g) Zachovat možnost periodického měření emisí, zabránit povinnosti kontinuálního měření. Kontinuální měření představuje významné náklady a zpracování výsledků je časově náročné.
- 1.3.7.2. Zachovat omezení SNCR na rotační pece s předeheřivačem. U jiných typů pecí je neúčinná.
- 1.3.7.4.1. Tabulka 11, pozn. (3), Zachovat výjimku pro MFSK z limitu CO. Emise CO jsou s tímto typem pecí z technologických důvodů nevyhnutelně spojené.
- 1.3.9. Tabulka 14 BAT AEL pro kovy v kouřových plynech z pecí při použití odpadů. Zabránit sledování emisí Hg a ostatních kovů při spalování standardních paliv. Standardní suroviny a paliva nejsou zdrojem emisí kovů. V případě specifických podmínek konkrétní instalace je to úřadům známo a můžou stanovit tuto povinnost v IP.
- 1.3.7. – 1.3.8. Zabránit snížení limitů NO_x, SO_x, TOC a PCDD/F. Tyto limity jsou aktuálně dosažitelné, nicméně na jejich horních hranicích. Jakékoliv snížení by představovalo problém. Ve srovnání s jinými sektory jsou tyto limity již dost nízké.

Total EuLA database NOx 2016

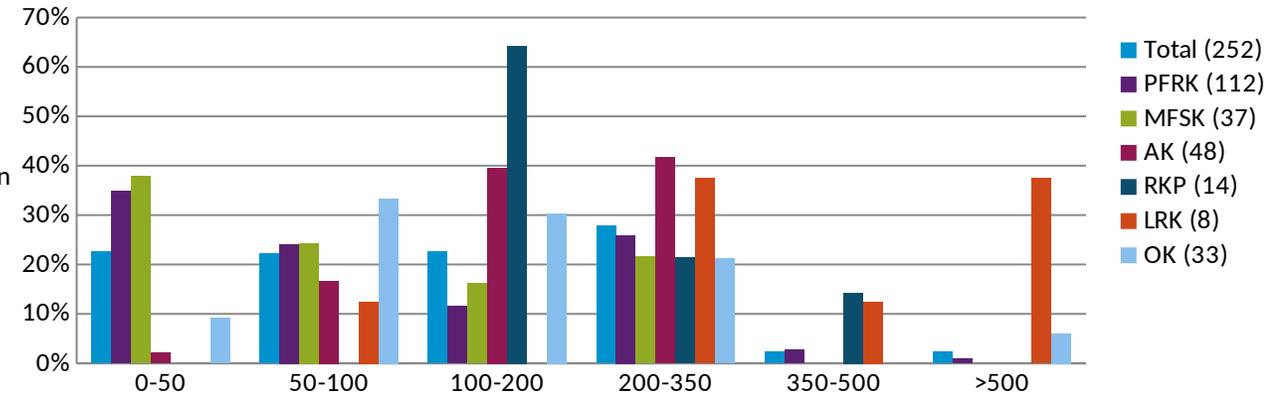


| EuLA database NOx | Unit | Total (252) | PFRK (112) | MFSK (37) | AK (48) | RKP (14) | LRK (8) | OK (33) |
|-------------------|--------|-------------|------------|-----------|---------|----------|---------|---------|
| Number | # | 252 | 112 | 37 | 48 | 14 | 8 | 33 |
| mean | mg/Nm3 | 151,8 | 125,9 | 94,6 | 174,6 | 221 | 365 | 189 |
| median | mg/Nm3 | 145 | 74,7 | 54,3 | 196 | 183,5 | 330,2 | 197,3 |
| max. | mg/Nm3 | 899 | 641 | 206 | 314 | 471 | 613 | 899 |
| min. | mg/Nm3 | 13,3 | 13,6 | 13,3 | 26,2 | 108,7 | 77,4 | 34,3 |
| 0-50 | % | 23% | 35% | 38% | 2% | 0% | 0% | 9% |
| 50-100 | % | 22% | 24% | 24% | 17% | 0% | 13% | 33% |
| 100-200 | % | 23% | 12% | 16% | 40% | 64% | 0% | 30% |
| 200-350 | % | 28% | 26% | 22% | 42% | 21% | 38% | 21% |
| 350-500 | % | 2% | 3% | 0% | 0% | 14% | 13% | 0% |
| >500 | % | 2% | 1% | 0% | 0% | 0% | 38% | 6% |

Total EuLA database NOx 2016



Total EuLA database NOx 2016



| | |
|--------------------|--|
| Biomasa přes 90% - | 2 PFRK přes 350 mg/Nm ³ 1 PFRK přes 500 mg/Nm ³ |
| Černé uhlí - | 2 OK přes 500 mg/Nm ³ 1 LRK přes 500 mg/Nm ³ |

| | | |
|------------------------|---|----------------------------|
| Z. plyn | } | pod 350 mg/Nm ³ |
| Lignit | | |
| Fosilní kapalná paliva | | |
| Koks | | |
| Antracit | | |
| Petcoke | | |
| Odpady (mimo biomasu) | | |