

Draft JRC Reference Report on Monitoring of Emissions from IED installations

EURELECTRIC comments

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EURELECTRIC is the voice of the electricity industry in Europe.

We speak for more than 3,500 companies in power generation, distribution, and supply.

We Stand For:

Carbon-neutral electricity by 2050

We have committed to making Europe's electricity cleaner. To deliver, we need to make use of **all low-carbon technologies**: more renewables, but also clean coal and gas, and nuclear. Efficient electric technologies in **transport and buildings**, combined with the development of smart grids and a major push in **energy efficiency** play a key role in reducing fossil fuel consumption and making our electricity more sustainable.

Competitive electricity for our customers

We support well-functioning, distortion-free **energy and carbon markets** as the best way to produce electricity and reduce emissions cost-efficiently. Integrated EU-wide electricity and gas markets are also crucial to offer our customers the **full benefits of liberalisation**: they ensure the best use of generation resources, improve **security of supply**, allow full EU-wide competition, and increase **customer choice**.

Continent-wide electricity through a coherent European approach

Europe's energy and climate challenges can only be solved by **European – or even global – policies**, not incoherent national measures. Such policies should complement, not contradict each other: coherent and integrated approaches reduce costs. This will encourage **effective investment** to ensure a sustainable and reliable electricity supply for Europe's businesses and consumers.

EURELECTRIC. Electricity for Europe.

Comments from (Forum Member)	Comment number	Chapter No. / section No. (if available)						Chapter title (only if there is no section or chapter No.)	Page # (PDF version of the document)	Comment description	Proposal for modification	Rationale
		3	4	4	3							
EURELECTRIC	1	3	4	4	3			24	paragraph conclusion: However, BAT-AELs are, in general, expressed without mentioning the measurement uncertainty. Instead, provisions for the consideration of the measurement uncertainty are laid down in the IED, in national legislation and/or in the relevant (EN) standards.	Add: The AMS relative expanded uncertainty target is prescribed by EN 15267-3 to ensure that the AMS passes QAL2 and QAL3 checks under EN 14181. EN 15267-3 specifies that the AMS uncertainty shall be less than 75% of the confidence interval set by the IED (the maximum permissible uncertainty). Therefore the AMS uncertainty, based on the certification performance, along with the uncertainty of the Standard Reference Method that is used to calibrate the AMS, should be taken into consideration when deriving ELVs from the BAT-AEL ranges.	Measurement uncertainty must be taken into account by Member States since this is material to compliance.	
EURELECTRIC	2	3	4	4	4			26	The statement concerning the treatment of negative values is a compliance issue and this will be addressed by the forthcoming standard on Data Acquisition and Handling Systems.	It is therefore proposed that the following example, now in par 3.4.4.4, should be inserted in par 3.4.4.3: "According to the Austrian ordinance on the measurement of emissions to air from boilers and gas turbines, validated average values (i.e. half-hourly average values after subtraction of the measurement uncertainty) which are negative have to be set as zero"	This is currently a compliance issue so an example should be given - as is the case earlier in the document.	
EURELECTRIC	3	3	4	4	3			37	Existing text (final sentence in this section): Instead, provisions for the consideration of the measurement uncertainty are laid down in the IED, in national legislation and/or in the relevant (EN) standards. It is proposed that additional text gives an example of how compliance is assessed, taking into account the increased measurement uncertainty at lower concentrations	Additional sentences (to follow on from the existing text): For example, in The Netherlands, in order to address the higher relative uncertainty that applies at ELVs lower than those specified in the IED, the IED confidence interval is applied as an absolute measurement uncertainty. Taking the example of an IED ELV of 50 mg/m³ and a confidence interval of 20%, the uncertainty used for compliance assessment is then always 10 mg/m³, even if a lower ELV is specified.	This is an example showing how the issue of a higher relative measurement uncertainty at lower concentrations can be addressed (as raised in the NERIS-CEWEP study).	
EURELECTRIC	4	4	3	2	2			37	lack of QAL3 procedure for the case of non-extractive AMS and QAL3 frequency should be commented	In QAL3 replication add: In some cases for non-extractive AMS, QAL1 instrument certificate (i.e. TUV, mCERTs) defines frequency for zero and span check using special kits. The manufacture specifies that it is not fully QAL3 compliant, as indicated in EN 14181:2015 par 7.5.4. Regarding QAL3 procedure frequency, considering that during QAL3 procedure AMS data lack occurs, weekly procedure could be deemed appropriate (EN 14181:2015 par 7.5.2 AII.C.3).	QAL3 is responsibility of plant operator whenever it's possible, the case of instruments not fitted for QAL3 procedure should be highlighted.	
EURELECTRIC	5	4	3	2	6			41	There is no indication on measuring range / calibration range management.	Add as 1 st paragraph: At the stack, the AMS measuring range required for normal plant operation and/or D/NOx, can be greater than certification range (EN 14181). The calibration range, over which the AMS has been calibrated under the QAL2 procedure, is clearly within the measuring range. Both may be higher than the certification range of the AMS. For valid results in term of hourly/half-hourly average, single data over the measuring range should be accounted for as equivalent to 100%/105% measuring range upper limit.	Clarification of different ranges referred to in the standards. Suggestions for proper management of AMS measuring range, considering EN 15267-3 and CEN-TC264 prEN 00264076:2016.	
EURELECTRIC	6	4	3	2	6			42	Specify that validated averages (hourly and half-hourly) basis for calculations, when compliance is based on mass emissions is a matter for the Competent Authority.	REVIEW the sentence: "Emission rates, i.e. kg/h, could be are usually calculated on the basis of the measured values, without subtraction of the measurement uncertainty, in case of calculation using values of concentration and volume flow not already referred at standard condition (see 4.3.2.5). In case of limit on mass emission, Competent Authority should define the rule."	Use of unique validated averages data-base, considering uncertainty subtraction, for every following CEMS/DMS calculation is actually as option. Indicate as 'usual' the use of measured average without subtraction if's not fact based.	
EURELECTRIC	7	4	3	3	6	7		50	The document is explicitly establishing that the cost of periodic alternatives is fully dependant on sampling/monitoring frequency	"Sorbent trap sampling is easier to install and to operate and thus less expensive (if the sampling frequency remain low, such as sampling once every six months, once that emission levels are proven to be sufficiently stable)"		
EURELECTRIC	8	5	3	1				93	EN 15839:2006 does not concern on-line sensors/analysing devices users. It only concern manufacturers (see conclusions from the CEN TC230/WG4)	Add in the standard description of the EN ISO 15839:2006 that this standard only concerns manufacturers: "specifies test procedures to be conducted by manufacturers for performance testing of [...]"	This subject has been confusing for some time, before the european committee for standardization clarified the scope of the EN 15839 in comparison of the one of the future EN 17075.	
EURELECTRIC	9	5	3	5	8	1		108	The list of common parameters described in the chapter 5.3.5.8 should only be given as an example of what can be measured in water. This list may vary a lot according to countries legislations, specific needs, specific activities, etc.	Add as a reminder, at the end of the chapter 5.3.5.8.1, the following paragraph: "This list is only given as an example of which parameters are commonly measured in waters throughout Europe. This list may vary according to countries legislation, specific needs and/or activities taking place around the sampling spot"	Inserting a list of specific parameters (even common parameters) may result in having local legislations based upon that list regardless of the interest of measuring such parameters.	
EURELECTRIC	10	Annex A1						125	The Hg monitoring capability mentioned in the table refers only to one model/option. It is not fully representative of the available options	New footnote linked to Hg cell: "(6): Only one manufacturer/model delivering 0.8-10 µg/m³. Rest of devices being on the 0 to 40 (or 75) µg/m³ certified ranges"	A large set of TUV certificates are provided as evidences	
EURELECTRIC	11	4					Annexes	135	Table 7.5: Examples of mass flow thresholds for the continuous measurement of emissions to air, for the case of metals refers to periodic measurement / continuous sampling	Erse rows related to metals or change the title of Table 7.5: Examples of mass flow thresholds for the continuous measurement of emissions to air.	For metals (but Hg) there is no AMS certified method (see table 7.2). As indicated in table 7.5 note 17: it means not a continuous 'measurement' system but a "Measurement once per day of a representative, continuously taken sample."	

EURELECTRIC pursues in all its activities the application of the following sustainable development values:

Economic Development

▶ Growth, added-value, efficiency

Environmental Leadership

▶ Commitment, innovation, pro-activeness

Social Responsibility

▶ Transparency, ethics, accountability



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