

New concepts for NO_x emission measurement and limits - challenges for new fuels and fuel flexible systems

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- Current NO_x emission regulations
- Challenges for future combustion systems
- Consequences for NO_x emission limits and measurement techniques



- National Emission Reduction Commitments Directive (**NEC**) EU 2016/2284 defines five important air pollutants:
 - **Nitrogen oxides (NO_x)**
 - Non-methane volatile organic compounds (NMVOC)
 - Ammonia (NH₃)
 - Sulphur dioxide (SO₂)
 - Fine particulate matter (PM_{2,5})
- The general framework for industrial production plants is built upon the Industrial Emissions Directive (**IED**) 2010/75/EU and refers to the best available techniques (**BAT**) in specific sectors.
- The BAT and the associated emission levels/limits are documented in the best available techniques reference document (**BREF**) and the **BAT conclusions**.
- Individual transfer of the IED and BREFs including specific emission limit values into national legislation



- Definition of BAT-associated emission levels for reheating furnaces defined in the BREF “[Ferrous Metals Processing Industry](#)” (FMP)
- Table 1.9 in the BAT conclusions “[...] feedstock heating in hot rolling”:

Parameter	Type of fuel	Specific process	Unit	BAT-AEL (Daily average or average over the sampling period)	Indicative emission level Daily average or average over the sampling period)
NO _x	100 % natural gas	Reheating	mg/Nm ³	New plants: 80–200 Existing plants: 100–350	No indicative level
		Intermediate heating	mg/Nm ³	100–250	
		Post-heating	mg/Nm ³	100–200	
	Other fuels	Reheating, intermediate heating, post-heating	mg/Nm ³	100–350 ⁽¹⁾	

⁽¹⁾ The higher end of the BAT-AEL range may be higher and up to 550 mg/Nm³ when using a high share of coke oven gas or of CO-rich gas from ferrochromium production (> 50 % of energy input).

- “Indicative emission levels for emissions to air [...] refer to **concentration** (mass of emitted substances per volume of waste gas) under the following standard conditions: **dry gas** at a temperature of **273.15 K** and a pressure of **101.3 kPa**, and expressed in **mg/Nm³**.”
- Reference oxygen level is given for feedstock heating and drying: 3 vol-% (dry)
- For a measured NO_x concentration of 85 ppm @ 5 vol-% O₂ (dry) the emission value is calculated by:

$$Q_{NO_x, \text{dry, ref}} \left[\frac{mg}{m^3_{\text{dry}}} \right] = \underline{Q_{NO_x, \text{dry}} [ppmv_{\text{dry}}]} \cdot \left(\frac{21 - Q_{O_2, \text{ref, dry}} [vol\%_{\text{dry}}]}{21 - Q_{O_2, \text{dry}} [vol\%_{\text{dry}}]} \right) \cdot \rho_{NO_2}$$

$$Q_{NO_x, \text{dry, ref}} \left[\frac{mg}{m^3_{\text{dry}}} \right] = 85 \text{ ppmv}_{\text{dry}} \cdot \left(\frac{21 - 3 \text{ vol}\%_{\text{dry}}}{21 - 5 \text{ vol}\%_{\text{dry}}} \right) \cdot 2,05 \frac{kg}{m^3} = 196 \frac{mg}{m^3_{\text{dry}}}$$

- Either continuous emission monitoring system (CEMS) or periodical measurements with portable analyzer systems are applied to quantify the NO_x emissions of reheating furnaces.
- Standard reference method for the determination of the mass concentration of nitrogen oxides: **chemiluminescence** (EN 14792)
- Gas analyzer systems have to fulfill a number of standards (EN 15267 1-4, EN 14181, EN 15259, ...)
- Today, mostly **dry extractive gas analyzers** are used to measure NO_x and O₂ concentrations in the off-gas.



- **New fuels:**

- Hydrogen (H₂), ammonia (NH₃), biofuels (e.g. DME), new top gases, blends of natural gas (NG) and these fuels...



- **New oxidizers:**

- oxygen-enriched combustion, pure oxygen (O₂)



- **Fuel flexible operation:**

- fluctuating availability of fuels



Challenge – future combustion systems

- Case study I: NO_x concentration of $180 \text{ ppmv}_{\text{dry}}$ @ $3 \text{ vol.-%}_{\text{dry}} \text{ O}_2$

Basis	Unit	NG/air	H ₂ /air
measured NO_x level, dry off-gas	ppmv	180	180
Calculation acc. to BREF	mg/m ³ @ 3 vol-%	351	351
NO_x mass flow	g/h	350	257



- For a system retrofitted to hydrogen combustion or a fuel-flexible combustion system running from natural gas (NG) to hydrogen (H₂), the **NO_x mass flow** emitted through the stack **decreases by 26%** when switching from NG to H₂.
- **This results in lower NO_x emission limits for H₂ through the back door.**



Challenge – future combustion systems

- Case study II: NO_x mass flow (wet) per unit of energy: 110 mg/kWh @ 2 vol.-%_{wet} O₂

Basis	Unit	H ₂ /air	H ₂ /O ₂
NO _x amount in off-gas	mg/kWh	110	110
NO _x concentration (wet)	ppmv (wet)	182	567
NO_x concentration (dry)	ppmv (dry)	265	28222

- For a system running on pure oxyfuel combustion, the NO_x emission limit is not applicable¹.
- NO_x measurement technologies based on dry off-gas used today are not applicable for H₂/O₂ combustion (H₂O-concentration in the off-gas, NO_x-concentration in the dry off-gas)
- **Current NO_x limits and measurement techniques are not applicable to oxyfuel combustion with new and flexible fuel systems.**

¹ A calculation procedure to compare oxyfuel to air combustion for fossil fuels is formulated in the BREF FMP document. However, this is not applicable for H₂ as the basis is the CO₂-concentration in the off-gas.

Consequences – NO_x emission limits

- Current NO_x emission limits are only formulated for NG and "other fuels" in the BREF FMP
- New definitions of NO_x limits must be established to allow a fair comparison between different fuels and oxidizers



➔ Approach: limit definitions in "mass flow per energy unit" (→ mg/kWh) are applicable and comparable for all fuels



➔ Alternative: mass of NO_x per ton of product produced (→ kg(NO_x)/t(steel))



- NO_x measurement based on dry extractive techniques is the most commonly used and is also applicable to new and different fuels with air combustion.
- Additional O₂ (mandatory today) and H₂O (not applied today) measurements are needed to allow comparable results.
- Due to the high water vapour concentration in e.g. H₂/O₂ combustion (~98 vol-%), dry measurements of NO_x and O₂ with high accuracy are not possible.

➔ Approach: emission measurement on a wet basis



- For a NO_x limit in mg/kWh, the fuel quality must be measured and transmitted to the emission monitoring system to calculate the LCV and the min. off-gas volume.



- Legislation is not ready for the widespread introduction of defossilized combustion systems and fuel-flexible industrial furnaces.
- Open topics:
 - NO_x limit definitions
 - Revision of BREF FMP to new limit definitions
 - Development of emission measurement system
 - Emission measurement standards
- Stay tuned:
 - IOB will shortly publish a paper describing the upcoming challenges for NO_x limits and measurement in detail.
 - IOB and many partners are working on NO_x emission measurement solutions for H₂/air and H₂/O₂ combustion systems in the HYINHEAT project (www.hyinheat.eu)





Thank you for the attention!

Stay informed
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