

EMISSIONS FROM THE UTILITY POWER INDUSTRY IN POLAND - LIMITATIONS AND TRENDS

1. Introduction

The Polish provisions, limiting the emissions of harmful substances to the atmosphere, were significantly modified in 1998. The Decree [1], binding from February 1990 and stating the obligations of the economic units by the terms of the Environment Protection and Creation Act from 1980 (revised at the end of 1997 [2]), was replaced by the new legislation [3], [4] and [5]. Introduction of further decrees, limiting the emissions (e.g. for incinerating plants), is planned at the nearest time.

The revised Act came into force on January 1, 1998, i.e. on the first day of application of the sharpened requirements, concerning the emissions from "old" power plants, imposed by the preceding provisions [1]. The new limits of permissible pollutant concentrations [3], modifying the hitherto existing ones, were presented after further four months, and of emissions from power generation installations [4] after about nine months. The changes, introduced by the mentioned provisions, lead to certain discontinuity, not only in time, in the law in force in this field. The Decrees [3], [4] and [5] were introduced after seven years of operation [6] of the provisions, imposing on the industrial plants with own power units on organic fuel obligations, effecting in large investment costs for building protecting installations. In some cases the new limitations are less restrictive, than the previous ones, in other they are significantly sharpened without any transition period.

With regard to the power generation installations, the detailed limitations concern three categories, differentiated by the size and character of the sites:

- utility electric power, combined heat and power and heating stations about 100 enterprises, managing over 300 steam boilers of about 102000 t/h live steam total output, and water heaters of about 10000 MW_{th} total capacity;
- 198 captive combined heat and power stations, managing almost 700 boilers of 34000 t/h live steam total output, and few thousand smaller heating plants;
- municipal and settlement heating plants, managing few thousand small heaters of about 7000 MW total capacity.

The mentioned above sites use for their generation needs, almost exclusively, organic fuels, mainly solid ones. The electric energy generation is based in 99%, and the heat generation in 75%, on coal. That causes strong pollution of the atmosphere with combustion products and the resulting necessity of broad implementation of emission reduction programmes.

2. Emissions from the utility power industry

In the utility power industry, modernisation programmes were realised in the last years to reduce the basic pollutant emissions. A great part of the boilers were equipped with low-emission burners or other systems, reducing the emission of nitrogen oxides using primary methods. A sulphur dioxide emission reduction programme is realised, which is expected to reduce the sulphur emission from the electric power industry to the half of the national limit, determined in the II Sulphur Protocol. The efficiency of the dust extraction systems was also increased.

The data, concerning the emissions from power plants, are collected by the Energy Market Agency and published in the annual issues [9] and [10]. The principles of collecting the data for the utility power industry and district heating were changing from 1989 to 1991. Starting from 1992, this information can be accepted as fully uniform and concerns only utility power and combined heat and power stations. During the previous period, the captive combined heat and power stations were included into the common statistics. The information about basic pollutant emissions from 1989 to 1997 is set in Table 1. A tendency of burning low-sulphur and low-ash coals with much higher calorific value (Table 2) formed during this period. The Polish provisions imposed using of high quality fuels, improving the emission factors (related to the supplied fuel energy). The mean calorific value of the hard coals, burned in the utility power industry, increased from 18280 kJ/kg in 1989 to 21423 kJ/kg in 1997. At the same time, the sulphur content changed from 1.148% to 0.851 %. Such a trend was not observed in relation to lignites. That resulted, as it seems, from the lack of opportunity of changing the fuel supplier.

| Year | SO ₂ theor. emission thousand t | SO ₂ real emission thousand t | $SO_2 real/SO_2 theor.$ | NO ₂ emission thousand t | CO emission (indicatory) thousand t | Dust emission thousand t |
|------|--|--|-------------------------|---|---|--------------------------------|
| 1989 | 2190.2 | 1972 | 90.04 | 390 | | 720 |
| 1990 | 1701.6 | 1570 | 92.27 | 370 | | 570 |
| 1991 | 1665.4 | 1430 | 85.87 | 395 | | 480 |
| 1992 | 1510.0 | 1311 | 86.84 | 370 | 33.5 | 340 |
| 1993 | 1490.9 | 1283 | 86.06 | 373 | 33.5 | 295 |
| 1994 | 1511.2 | 1272 | 84.17 | 378 | 32.9 | 259 |
| 1995 | 1527.4 | 1222 | 80.00 | 381 | 31.0 | 194 |
| 1996 | 1608.8 | 1197 | 74.40 | 367 | 32.1 | 159 |
| 1997 | 1612.4 | 1110 | 68.84 | 317 | 30.8 | 118.8 |

Table 1. Basic pollutant emissions from the utility power industry in 1989-1997

Table 2. Mean parameters of the fuels, used in the Polish utility power industry in 1989-1997

| | | | | 100109 0000 10 | | | | | |
|------|-----------------------|------------|--------------------|---------------------|------------|--------------------|-----------------------|---------------|--------------------|
| Year | Hard coal consumption | Heat value | Sulphur content | Lignite consumption | Heat value | Sulphur content | Liquid fuels cons. | Heat value | Sulphur content |
| | thousand t | kJ/kg | % | thousand t | kJ/kg | % | thousand t | kJ/kg | % |
| 1989 | 54340 | 18280 | 1.148 | 70470 | 8100 | 0.661 | 260 | 40000 | 2.1 |
| 1990 | 46330 | 19600 | 0.973 | 66418 | 8290 | 0.594 | 260 | 40000 | 2.1 |
| 1991 | 45300 | 20138 | 0.966 | 67764 | 8046 | 0.575 | 260 | 40000 | 2.1 |
| 1992 | 42134 | 20920 | 0.863 | 64728 | 8418 | 0.596 | 267.54 | 39892 | 2.09 |
| 1993 | 40870 | 21331 | 0.844 | 66178 | 8295 | 0.597 | 254.06 | 40239 | 2.13 |
| 1994 | 41003 | 21388 | 0.847 | 65058 | 8265 | 0.619 | 261.97 | 40438 | 2.14 |
| 1995 | 42752 | 21463 | 0.852 | 62176 | 8489 | 0.634 | 254.56 | 40770 | 2.07 |
| 1996 | 44953 | 21434 | 0.869 | 62769 | 8473 | 0.649 | 311.2 | 40884 | 2.05 |
| 1997 | 43752 | 21423 | 0.851 | 62296 | 8504 | 0.687 | 294.78 | 41016 | 2.00 |

The observed SO_2 emission drop tendency results from the higher coal quality, but also from the building of desulphurisation installations. The emission of sulphur dioxide from the Polish power industry in 1997 was less than 70% of the theoretical value, calculated from the sulphur content in the fuels. Drop of the NO_x emission can be also observed in the last years. This result from the mentioned boiler facility modernisations was observed with certain delay.

3. Limitations on emission and concentration of harmful substances in the atmosphere

The new provisions, treating the reduction of emissions of harmful substances from power generation installations, were considerably extended in relation to the version from 1990. An attempt to eliminate some of their widely signalised shortcomings was also made. For example, the very difficult to control relation of the permissible emission to the supplied fuel energy was waived. The new limitations are stated in directly measurable concentration units (mg/m³), related to standard oxygen contents in flue gases. Following other countries' example, a possibility of operation with increased emission (for 240 hours), in case of cleaning system failure, was introduced.

The data, derived from [1] for Tables 3 and 4 and stated in g/GJ, have been converted, using the following values:

| for hard coals | $1 \text{ g/GJ} = 2.85 \text{ mg/m}^3 (6\% \text{ O}_2);$ |
|----------------------|--|
| for lignites | $1 \text{ g/GJ} = 2.52 \text{ mg/m}^3 (6\% \text{ O}_2);$ |
| for liquid fuels | $1 \text{ g/GJ} = 3.57 \text{ mg/m}^3 (3\% \text{ O}_2);$ |
| for natural gas | $1 \text{ g/GJ} = 3.70 \text{ mg/m}^3 (3\% \text{ O}_2),$ |
| and the results coul | d differ from the obtained for concrete fuel, because of the pointed |
| above incoherence. | • |

In the case of hard coal, in the table heads, corresponding to the least capacities (up to 5 MW_{th}), the limits for boilers with stationary-grate furnace were converted; in the capacity range up to 50 MW_{th} - limits for boilers with stoker furnace; and in higher capacity range - limits for boilers with coal-dust furnace and dry slagging. Of course, the boundaries between these capacities should be treated as conventional and only approximately corresponding to the transition between these types of boiler constructions. The comparison was made for hard coal, lignite, liquid fuels and natural gas. In [4] the requirements were defined for different types of gas fuels, and in [1] the limitations were stated exclusively for natural gas.

The converted values of permissible emissions, resulting from the Decree from 1990, are set in Table 3 in first order. The limits, binding from 1998, are presented in the next columns.

The limitations for the plants, built before 1990, are set in Table 4, in four columns each time. The limits, binding till 1998 (the first column), correspond to group A from [1], i.e. the plants, built before 1990. In compliance with [1], the requirements should be sharpened to the level in group B from [1] (the second column) on the turn of 1997. The Decree [4] introduced changes here, and the now binding permissible values (set in the third column) will be sharpened after December 31, 2005, to the level, set in the last column.

| Country | SO _x emission | NO _x emission | dust | SO _x emission | NO _x emission | dust |
|-------------|--------------------------|--------------------------|------|--------------------------|--------------------------|-----------|
| | New | plants | | Existing | plants | |
| Austria | 200 | 200 | 50 | 400/200 ** | 200 | 50 |
| France | 400 | 650/1300 * | 50 | 400 | 650/1300 * | 50 |
| Netherlands | 200 ****90% | 200 | 50 | 400 ****85% | 100-650 | 50 |
| Germany | 400****85% | 200 | 50 | 400 ****85% | 200 | 80/125 ** |

Table 5. Comparison of the permissible emissions for high capacity plants (500 MW_e and more) on solid fuels in selected countries

| Poland | 400 | 400/460 ** | 200/50 *** | 2500/2350 ** | 450/540 ** | 225/350 ** |
|----------------------|----------|------------|------------|--------------|--------------|------------|
| Turkey | 940 | 600 | 235 | 940 | 1875 | 235 |
| USA | 740-1480 | 860 | 40 | 1480 | 615-740 | 40 |
| United Kingdom | ****90% | 650 | 50 | quote limit. | quote limit. | 50 |
| Italy | 400 | 200 | 50 | 400 | 300 | 50 |
| Directions 88/609/EU | 400 | 650/1300 * | 50 | | | 1 |

the higher value concerns coals with less than 10% volatiles
 the 50 mg/m³ binds for plants, built after September 1998
 flue gas desulphurisation obligation

An information about the "dynamics" of the Polish air protection provisions could be derived from the data, presented in Tables 3 and 4. The permissible emissions of sulphur oxides, nitrogen oxides and dust, binding the largest power plants in selected countries [4], [11], are compared in Table 5. The limits, stated in the European Union Directions 88/609, are set in the last row of the Table.

The changes in the regulations, treating the harmful substance concentrations, introduced in 1998, were also considerable. Basing on [8], the local concentration standards for the basic air pollutants, emitted from power generation installations, are compared in Table 6 to the directions of the European Union, German and American standards, including the known as the most severe in the world Californian ones (CSS - California State Standards). The new provisions soothe the requirements, introduced in 1990 and treating the total suspended dust, but introduce requirement diversification, using special permissible concentration limit for dust with particle aerodynamic diameter up to 10 μ m. The limits of the permissible concentration of carbon oxide in the air were considerably soothed. The requirements, concerning sulphur oxides, were slightly soothed, and those for nitrogen oxides were kept on similar level (except the sharpened mean annual value). The new directions of the European Union, treating the concentrations of sulphur and nitrogen oxides, are more severe, than the Polish provisions.

| Substance | Period | Poland | Europea | n Union | Germany | USA | | |
|-----------------|--------|-----------------------|---------|---------|----------|-----------|-----------|------------|
| | | acc. to [1] ("areas") | [3] | New | Existing | | Federal | California |
| Total | 30min | 350 | 250 | · · | - | - 1 | - | |
| supended | 24 h | 150 | 120 | - 1 | - | | 260 | - 1 |
| dust | year | 75 | 50 | - | - | | 75 | - |
| SO ₂ | 30min | 500 | 440 | 350* | - | 400 (3 h) | 650 (1 h) | - |
| | 24 h | 150 (125 from 2005) | 150 | 125* | 250-80 | 140 | 365 | 105 |
| | year | 40 (30 from 2005) | 32 | 20 ** | 80-120 | 60 | 80 | - |
| NO ₂ | 30min | 500 | 500 | 200*** | 200 (1h) | 200 (1h) | - | 470 (1h) |
| | 24 h | 150 | 150 | - | - | 80 | - | - |
| | year | 40 | 50 | 30** | - | - | 100 | - |
| CO | 30min | 20000 | 5000 | - | - | 30000(1b) | 40000(1h) | 23000(1h) |
| | 24 h | 5000 | 1000 | - | - | 10000(8h) | 10000(8h) | 10000(8h) |
| | year | 2000 | 120 | - | - | -`´ | - ` ´ | - ` |

* from 2005 ** 2 years after admission of the directions *** from 2010

In the place of sharpened limitations (in relation to the basic ones) for the "especially protected areas", the new Decree introduced special, differentiated requirements for health resorts and forest complexes and national parks. These are usually soothed in relation to the previous ones, just like the basic limits, binding in the other regions ("areas").

| Pollutant | Charge in PLZ/t | Charge in EUR/t | Charge in DEM/t |
|------------------------------------|-----------------|-----------------|-----------------|
| Dust from burning | 220 | 53 | 103 |
| Coal-graphite dust, carbon black | 900 | 215 | 423 |
| Lignite dust | 350 | 84 | 164 |
| Other dust | 350 | 84 | 164 |
| Sulphur dioxide | 330 | 79 | 155 |
| Nitrogen oxides (NO ₂) | 330 | 79 | 155 |
| Carbon oxide | 90 | 21.5 | 42.3 |
| Carbon dioxide | 0.17 | 0.041 | 0.08 |

Table 7. Charges for air pollutant emissions in Poland in 1999

The Polish charges for emission of the most common air pollutants are set in Table 7 [13]. They are changed each year by appropriate decree in relation to the annual inflation rate. The fines for exceeding the emission limitations are ten times larger than the charges.

4. Practical shortcomings of the provisions

The new Polish provisions, treating the emission of harmful substances to the atmosphere, are significantly improved in relation to the hitherto existing ones. However, there still are some practical shortcomings. The most important of them are:

- the lack of trasparent, logical conception and procedures for stating the emission limitations it is still a decision of administration and is not closely connected to the technological level and progress;
- some of the changes, concerning existing plants, are considerable, and all came into force without a transition period, usually recommended for such regulations;
- the Decree [4] does not regulate emissions from engines and gas turbines, which is the most dynamic sector of the power industry in the whole world (the interest on building installations with gas turbines is at present time very wide in Poland - the first one has already been commissioned, a large number of others (several dozen) is in stage of planning or construction), and the lack of uniform regulations will effect the arranging of the requirements for this facility category in the future;
- lack of uniform method and condition requirements for emission measurements in power installations, which creates opportunity to obtain always "appropriate" results

The changes in the regulations, treating the harmful substance concentrations, introduced in 1998, were also considerable and, unfortunately, inconsistent. 128 new substances were added to the pollutant list in [3], which included 44 items till that time. Even the previous list has already been considered as too large. The present one is a special kind of record. We should not forget, that in compliance with the Polish provisions, the concentration limitations could indirectly lead to emission distribution, obtained using calculation procedures, which results could differ from the real harmful substance concentrations in the atmosphere [7]. The final distribution, resulting from the more severe condition, is determined by 'decision of the administration.

5. Recapitulation

The utility power industry is the main supplier of common pollutants to the atmosphere in Poland. Because of the concentration of the largest sources in small entitier of high capacity plants, the activities in this sector determine in great part the national emission, success of the national air protection programmes and meeting the international obligations.

As it was presented above, the emission of harmful substances from the utility power industry in Poland has been reduced, and there is a stable tendency for further reduction. The market conditions in combination with emission and concentration limitations impose using of more calorific and clean fuels and implementing of lowemission burning and cleaning technologies.

The regulation of the Polish environment protection provisions by the requirements of the European Union is the most expensive, after the agriculture reform, integration undertaking. The whole programme is estimated to cost about 35 billion euro, including 14 billion euro air protection requirements acceptance costs.

The last changes in the Polish air protection provisions led to soothing of some limitations and sharpening of others at the same time. In a certain manner, it had to be an attempt to correct the shortcomings of the previous provisions [1], especially the inordinate severity in relation to some facility categories. The changes lead to partial uniformity of the "plant" limitations with the proposed by the European Union. We should remember, that the corrected provisions impose modernisation costs of industrial installations, which greater part should be borne by the power plants with largest units. The investors, building new plants, have to meet practically the same as EU requirements.

Consistently formulated requirements, representing the technical and financial capabilities, determine the effect of the modernisation efforts. Labour-consuming procedures, allowing to define the opportunity of using the attainable technologies, do duty for that. There is a lot to be done in this field in Poland.

Bibliography

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- [2]Revision of the Environment Protection and Creation Act and some other acts from August 29, 1997 (Dziennik Ustaw nr 133 pos. 885).
- [3]Decree of the Minister of Environment Protection, Natural Resources and Forestry from April 28, 1998, concerning permissible polluting substance concentrations in the air (Dziennik Ustaw nr 55 pos. 355).
- [4]Decree of the Minister of Environment Protection, Natural Resources and Forestry from September 8, 1998, concerning polluting substance emissions to the air from technological and technical processes (Dziennik Ustaw nr 121 pos. 793).
- [5]Decree of the Minister of Environment Protection, Natural Resources and Forestry from September 18, 1998, concerning particular principles of determining the permissible polluting substance types and quantities to be emitted to the air and requirements to be met by the documentation, indispensable for decision, determining the permissible polluting substance types and quantities to be emitted to the air (Dziennik Ustaw nr 124 pos. 819).
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 Table 3. Permissible emissions from power plants; comparison of the requirements from 1990

 and 1998. Permissible content [mg/m3] (6% O2; hard coal fired plants, built after 1990)

| | SOx | | NOx | | dust | | |
|-----------------------------------|------|----------------|----------------|----------------|----------------|--|------------------------------------|
| Source thermal capacity [MWth] | 8 | 1998 Decree | 1990 Decree | 1998 Decree | 1990 Decree | 1998 Decree licences before 1998 | 1998 Decree "fresh" licences |
| <5 | 1850 | 1500 | 100 | 400 | 3900 | 700 | 100 |
| 5-50 | 570 | 1300 | 270 | 400 | 1710 | 400 | 100 |
| 50-100 | 570 | 850 | 480 | 460 | 370 | 350 | 50 |
| 100-500 | 570 | 850-400 | 480 | 460 | 370 | 350 | 50 |
| >500 | 570 | 400 | 480 | 460 | 370 | 200 | 50 |

conversion factor from g/GJ to mg/m3 = 2.85 (1990 Decree; less than 5 MWth - stationary-grate boilers; 5-50 MWth - stoker boilers; 50 MWth and more - coal-dust boilers with dry slagging)

Permissible content [mg/m3] (6% O2; lignite fired plants, built after 1990)

| | SOx | | NOx | | dust | dust | | |
|--------------------------------|-----|----------------|----------------|----------------|----------------|---------------------------------------|-----------------------------------|--|
| Source thermal capacity [MWth] | 1 | 1998 Decree | 1990 Decree | 1998 Decree | 1990 Decree | 1998 Decree licence before 1998 | 1998 Decree "fresh" licence | |
| <5 | 500 | 1500 | 380 | 400 | 240 | 700 | 100 | |
| 5-50 | 500 | 1300 | 380 | 400 | 240 | 400 | 100 | |
| 50-100 | 500 | 850 | 380 | 400 | 240 | 350 | 50 | |
| 100-500 | 500 | 850-400 | 380 | 400 | 240 | 350 | 50 | |
| >500 | 500 | 400 | 380 | 400 | 240 | 200 | 50 | |

conversion factor from g/GJ to mg/m3 = 2.52 (1990 Decree; boilers with dry slagging)

Permissible content [mg/m3] (3% O2; plants on liquid fuel, built after 1990)

| Source thermal | SOx | | NOx | | dust | | |
|----------------|-----------|------------|-----------|------------|------------|-------------|--|
| capacity[MWth] | 1990 Decr | 1998 Decr. | 1990 Decr | 1998 Decr. | 1990 Decr. | 1998 Decree | |
| <50 | 4460 | 850 | 320 | 400 | - | 5 | |
| 50-300 | 610 | 850 | 430 | 460 | - | 5 | |
| 300-500 | 610 | 850-400 | 430 | 460 | - | 5 | |
| >500 | 610 | 400 | 430 | 460 | - | 5 | |

conversion factor from g/GJ to mg/m3 = 3.57

Permissible content [mg/m3] (3% O2; plants on natural gas, built after 1990)

| Source thermal | SOx | | NOx | | dust | | |
|----------------|------------|------------|------------|------------|------------|-------------|--|
| capacity[MWth] | 1990 Decr. | 1998 Decr. | 1990 Decr. | 1998 Decr. | 1990 Decr. | 1998 Decree | |
| <5 | | 35 | 130 | 150 | - | 5 | |
| 5-50 | - | 35 | 130 | 300 | - | 5 | |
| >50 | - | 35 | 310 | 350 | - | 5 | |

conversion factor from g/GJ to mg/m3 = 3.7

Source thermal SOx NOx dust capacity [MWth] till 1998 after 1998 till 2006 after 2006 till 1998 after 1998 till 2006 after 1998 hill 2006 after 2006 after 2006 till 1998 <5 5-50 50-100 100-300 300-500 >500

Table 4. Permissible emissions from power plants; comparison of the requirements from 1990 and 1998

Permissible content [mg/m3] (6% O2; hard coal fired plants, built before 1990)

conversion factor from g/GJ to mg/m3 = 2.85(1990 Decree; less than 5 MWth - stationary-grate boilers; 5-50 MWth - stoker boilers;

50 MWth and more - coal-dust boilers with dry slagging)

Permissible content [mg/m3] (6% O2; lignite fired plants, built before 1990)

| Source thermal | SOx | | | | NOx | | | | dust | | | |
|-----------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|
| capacity [MWth] | till 1998 | after 1998 | till 2006 | after 2006 | till 1998 | after 1998 | till 2006 | after 2006 | till 1998 | after 1998 | till 2006 | after 2006 |
| <300 | 3880 | 2700 | 2500 | 2000 | 570 | 380 | 450 | 450 | 490 | 240 | 225 | 225 |
| 300-500 | 3880 | 2700 | 2500 | 2000 | 570 | 380 | 450 | 450 | 490 | 240 | 225 | 225 |
| >500 | 3880 | 2700 | 2500 | 2000 | 570 | 380 | 450 | 450 | 490 | 240 | 225 | 100 |

conversion factor from g/GJ to mg/m3 = 2.52(1990 Decree; boilers with dry slagging)

Permissible content [mg/m3] (3% O2; plants on liquid fuel, built before 1990)

| Source thermal | SOx | | | | NOx | | | | dust | | | |
|-----------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|-----------|------------|
| capacity [MWth] | till 1998 | after 1998 | till 2006 | after 2006 | till 1998 | after 1998 | till 2006 | after 2006 | till 1998 | after 1998 | till 2006 | after 2006 |
| <5 | 6140 | 4460 | 4375 | 850 | 430 | 430 | 450 | 450 | - | - | 50 | 50 |
| 5-50 | 6140 | 4460 | 4375 | 1700 | 430 | 430 | 450 | 450 | - | - | 50 | 50 |
| >50 | 6140 | 610 | 3500 | 1700 | 570 | 570 | 630 | 630 | - | - | 50 | 50 |

conversion factor from g/GJ to mg/m3 = 3.57

Permissible content [mg/m3] (3% O2; plants on natural gas, built before 1990)

| Source thermal SOx | | NOx | | dı | dust | | | |
|---------------------------|----------------------|----------------------|----------------------|----------------|---------------------|----------------------|--|--|
| capacity [MWth] till 1998 | after 1998 till 2006 | after 2006 till 1998 | after 1998 till 2006 | after 2006 til | ill 1998 after 1998 | till 2006 after 2006 | | |

| ſ | <5 | - | - | 35 | 35 | 220 | 130 | 150 | 150 | - | - | 5 | 5 |
|---|------|---|---|----|----|-----|-----|-----|-----|---|---|---|---|
| T | 5-50 | - | - | 35 | 35 | 220 | 130 | 300 | 300 | - | - | 5 | 5 |
| Ţ | >50 | - | - | 35 | 35 | 540 | 310 | 350 | 350 | - | - | 5 | 5 |

conversion factor from g/GJ to mg/m3 = 3.7

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