

9th EU ETS Compliance Conference 13 and 14 November 2018

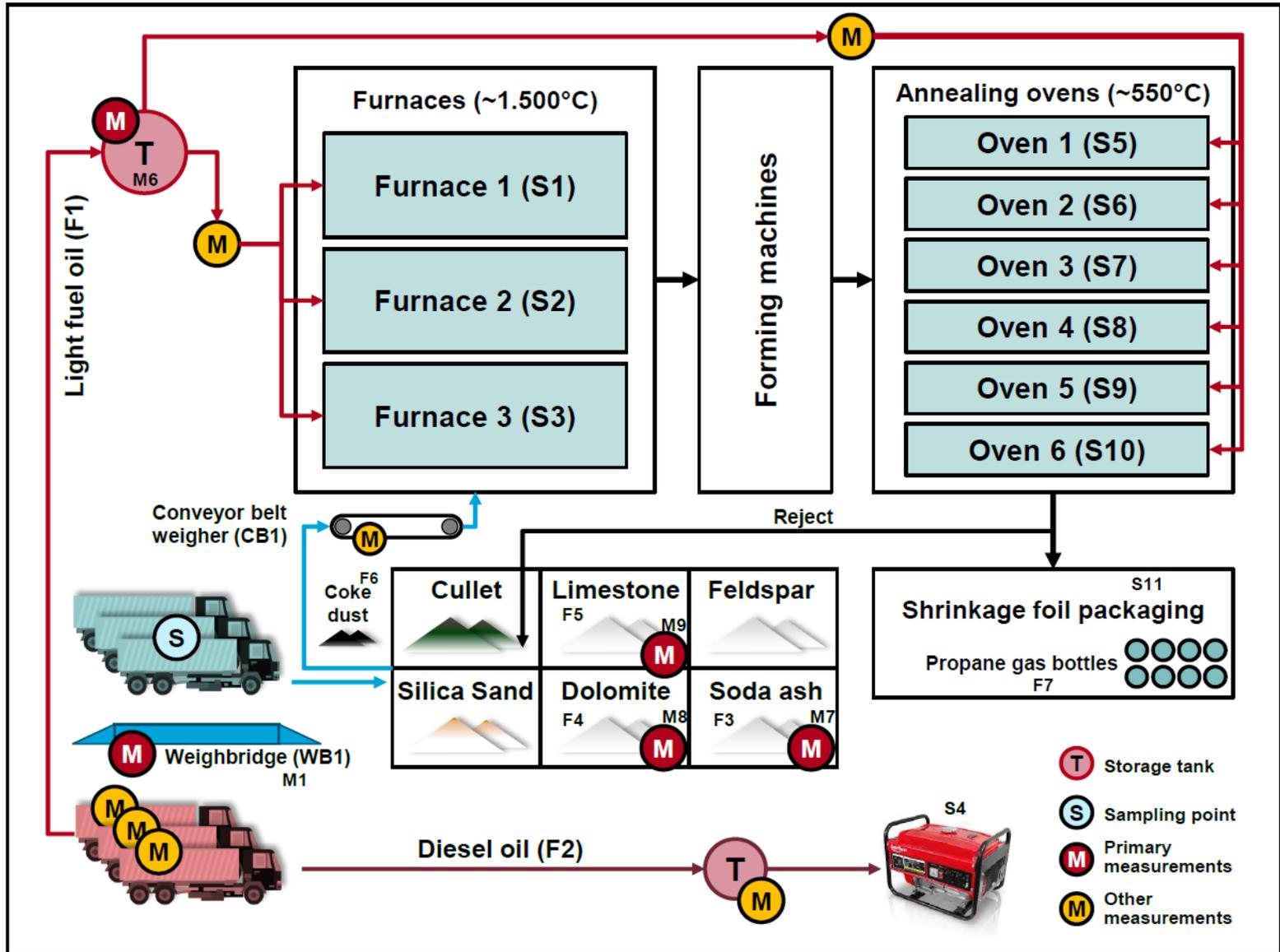


Practical steps to plan an EU ETS inspection

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Example glas installation Round Robin



Example installation: Source streams

No.	Source stream name	estimated emissions [t CO2/y]	Categorisation of source stream
F1	LFO	75.000	major
F2	Diesel oil	1	de-minimis
F3	Soda ash	5.500	major
F4	Dolomit	4.000	minor
F5	limestone	1.400	minor
F6	Coke dust	50	de-minimis
F7	Propan gas	10	de-minimis
		85.961	

Preparation before inspection

- Preparation of an draft inspection plan (subjects to be inspected) and CA inspection team
- Communication with operator (4 to 6 weeks beforehand):
 - **Date** of on-site inspection and CA inspection team
 - Rough **outline of subjects** which will be inspected on-site
 - Ask for **submission of particular documentation** before-hand for desk-top review (later adjustments of the inspection plan possible)
 - **Required** operator's **personal**
 - Clarify **safety** briefing and safety equipment with operator
 - Information that **regional CA** will be informed and invited

Round Robin: Submission of documentation before inspection

- **Soda ash, Dolomite,**
 - (Excel-) files which show how emissions are calculated: how are analyses results allocated to corresponding source stream amounts?
- **Dolomite**
 - MP version 1 - analysis:
in-house lab (non-accredited) every batch, annual consistency check with accredited lab; annual analysis by accredited lab, more analyses in accredited lab causes unreasonable costs
 - MP version 2, version 3 - analysis:
four times a year in an accredited lab is used (ACME)
 - ➔ Require operator to submit following documents:
 - Analyses protocols 2017 of the in-house lab
 - Result of the consistency check 2017 with accredited lab
 - Analyses protocols 2017 of accredited lab ACME

Round Robin: Aspects to check on-site (I)

- Explanation of the **installation's operation**, e.g. other/further measuring instruments available for operating the installation?
 - More accurate method available?
 - Possibilities for improvement/cross-checks?
- **Data flow and comparison of data**
 - How are cross-checks carried out?
e.g. Comparison of supplier data and own data
 - What happens if cross-checks deliver “negative” results → tolerance / intervention values? → evaluation of the procedure, review documentation
- **Dolomit**
 - Based on the result of the desk review of submitted analyses protocols that using in-house lab might be more accurate
→ review sampling and analyses at non-accredited in-house lab on-site

Round Robin: Aspects to check on-site (II)

- **Light fuel oil (LFO)**
 - Review a **truck's weighing procedure** on WB1
 - Are full and empty trucks weighed or is a standard value taken for tare weight?
 - Is system exposed to wind/weather?
 - Procedure implemented for zero point checks?
 - Which procedure implemented for data collection and assignment? (deliveries of different source streams are all weighed by same truck weighbridge)
 - Review **data flow from weighing instruments** (WB1 and storage tank) to emission report
 - Ask for **verbal explanation** of determination method during period where **new WB1 was installed**
 - verification report says: "LFO: Furnace meter readings were used..."
 - review determination protocols of storage tank filling levels at the beginning and the end of the downtime of WB1 → no gap?

Follow-up

Inspection protocol is sent to operator with following information:

- Reviewed subjects on-site
- Reviewed documents on-site
- Results of the inspection (issues to be corrected, information to be submitted, recommendations)

Thank you for your attention!

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