



# BoilerBlast News<sup>®</sup>

## We Proudly Profile

[Karges-Faulconbridge, Inc](#)  
&  
[Indeck Keystone Energy, LLC](#)

## CIBO Meetings & Conferences

EE/Technical Committee Meetings  
Radisson Hotel  
Crystal City, VA  
June 10-11  
Sept 9-10  
Dec 2-3

The Fluidized Bed Combustion and Stoker Fired Operations and Performance Conference  
Hershey Lodge  
Hershey, PA  
May 19-21

The Industrial Emissions Control Technology XII Conference and Natural Gas Conversion Workshop

Holiday Inn by the Bay  
Portland, ME  
Aug 4-7

The 36th Annual Meeting  
Oct 15-17  
Hotel Santa Fe  
Santa Fe, NM

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## Energy

The all-out war on coal continues at the White House, in every agency and department of the government, in the name of Climate Change (Man-made Global Warming) and to save the earth from catastrophic projections of worldwide flooding and other unfathomable the-sky-is-falling disasters about which the science is growing continually more uncertain. There is a growing sense of urgency. It does not help their case that this year's winter has been the coldest in more than 100 years. In this light, why try to kill or eliminate coal the most abundant, safe, available and inexpensive energy source in the United States and increase the energy cost to industry and household consumers, especially the less fortunate and elderly, on fixed incomes, who pay a disproportional share of their total income on energy.

At least we know energy efficiency is something everyone should be able to get behind. Senate Bill S.2074 was introduced in the Senate on February 27th by Senator Shaheen (D-NH) with 13 co-sponsors. It has been referred to the Energy and Natural Resources Committee. There are only two sections that impact our members directly: Title II – Industrial Efficiency and Competitiveness that deals with how DOE addresses energy efficiency within the industrial sector with clear and consistent authority to accelerate development, demonstration and deployment of new and advanced energy efficiency technologies; and Title IV – Regulator Provisions Subtitle E – Third-Party Testing for voluntary certification Programs. While this is a Bill that can probably pass as it is, the desire to use anything that might pass as vehicle to carry other concerns that are not so universally supported (that could support coal, oils or renewables) puts this as almost impossible to get through this year.

General Tax reform is now on the table and much of the activity, over the next 6 to 8 months, within this debate will center around renewable fuels, production tax and investment tax credits. This is an area where CIBO does not play. While we do not take specific positions within this arena, it is important to note we should all look how those issues will affect the cost of energy for our companies and our families. We must continue to remind people that it is impossible to make or do anything without energy; and, what happens to the cost of energy happens to the cost of everything we buy or use or desire.

## Environment

The legal wrangling continues to possibly delay a final ruling by the courts but provide time for EPA to consider and support how they used the statistical Upper Prediction Limit (UPL) in setting the numeric standard for limited data sets and in general the use of fuel variability to generate realistic limits representative of what is scientifically and naturally achievable in real life. All this is being done under a remand of some but not all limits. The net result at this point is we must continue to work toward compliance of the rule as written by January 31, 2016. We will be talking about this implementation at the Fluidized Bed Combustion XXVII & Stoker Fired Boiler Operations and Performance Conference in May (see below) and the Industrial Emission Control Technology XII Conference and Natural Gas Conversion Workshop this August.

As the compliance plans move from planning to implementation the operations people are indicating they may not be able to meet the limits on a 24/7 yearly basis or be able to startup a boiler unless the Start-up/Shut down provisions are modified to allow the process to consider boiler and emission control safety requirements. Unless you have seen a boiler explosion or electrostatic precipitator fire, these issues do not seem to have the same level of importance as given them by the line operators. We believe progress is being made. Our members should be seeing information requests regarding Start-ups (hot and cold) and Shut-downs to help. When you see this, any information you can provide will be extremely helpful as we look for cost effective ways to actually comply.

Also, EPA has reaffirmed that they will complete the Coal Ash rule by December 19th of this year. More on that to come with the next newsletter. We will be discussing this at the May Conference.

One good thing, or almost good, is that we have an EPA proposal to amend the NHSM Rule to include additional materials, we currently know as fuels, to actually be considered fuels under the rule. From EPA's Frequent questions – NHSM Categorical Rule Proposal,

*"Based on all available information, the EPA determined that the following NHSMs are not solid wastes when burned as a fuel in combustion units and is proposing to list them as categorical non-wastes under section 241.4(a): (1) Construction and demolition (C&D) wood processed from C&D debris according to best management practices, (2) Paper recycling residuals, including old corrugated cardboard (OCC) rejects, generated from the recycling of recovered paper and paperboard products and burned on-site by paper recycling mills the boilers of which are designed to burn solid fuel, and (3) Creosote treated railroad ties that are processed and combusted in units designed to burn both biomass and fuel oil."*

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We see no reason to limit the use of creosote treated railroad ties to only units designed to burn biomass and fuel oil. CIBO will be commenting on this proposal. There are coal fired units currently permitted to burn railroad ties as a fuel. If you would like to participate in the development of these comments and have not signed up for the work group, email < [cmarrriott@cibo.org](mailto:cmarrriott@cibo.org) >.

## Technical

The Focus Group session on "Combined Heat and Power" associated with the March EE/Technical Committee Meetings received very good reviews. Nate Verhanovitz of Michigan State University presented heat rate issues and future emissions of combined heat and power. John Hodge of Black & Veatch Corporation presented a case study on combined heat and power. Leslie Witherspoon of Solar Turbines Incorporated presented an overview of gas turbines and combined heat and power, as well as, associated permitting issues. Presentations are on the CIBO members' only website.

## Fluidized Bed Combustion XXVII & Stoker Fired Boiler Operations and Performance Conference May 19-21, 2014 Hershey Lodge, Hershey, Pennsylvania

The conference is expanded to stoker and all solid fuel fired boilers because of similar operational and performance concerns. With BOILER MACT, Area Source GACT, CISWI, MATS and a Transport Rule compliance on the short term horizon, and compliance plans being turned over to the operators and plant engineers for implementation, the reality of the situation has hit home. The conference will include Boiler Owners' Only and Manufacture' and Suppliers' Only Forums, Results of the CIBO Annual Operations and Performance Survey, Energy Assessments & Tune-ups, and discussion on Plant Performance Assessment, Maintenance, and Emission Control & Sorbent Considerations. 2013 operations & performance surveys have been sent out and responses are coming in. If you are an operator or owner and have not seen yours give us a call. The information is extremely helpful for benchmarking and advocacy on technical, energy and environmental issues. Agenda and On-Line registration is on [www.cibo.org](http://www.cibo.org). Exhibit Space is SOLDOUT.

## Technical Focus Group, Energy & Environmental Committee Meetings –June 10-11, 2014 Crystal City, VA

Focus Group Topic is "Stack Testing." Key topics of Committees to be addressed include: Energy Assessments; BMACT Major Source, Area Source, CISWI & NHSM Reviews and Compliance Concerns; Litigation and Reconsideration for BMACT Suite of Rules; Ozone Implementation Rule Issues; PM2.5 Annual Standard; and Coal Ash, GHG, Litigation, NAAQS, and Water Issues Updates.

## From the President's Desk – Bob Bessette

We are now into April. Hopefully, Spring is really here and the weather will warm up a bit. Natural Gas cost and availability concerns continue to create uncertainties in picking a compliance pathway on top of all the litigation uncertainties. MACT on MACT and a distrust of the White House on any environmental issue is making it difficult for any company to move ahead with what we know to be something better for the environment and allowing business to survive, if only by a little. The possibility that the White House will say, it is not enough (nothing, even a complete elimination of all energy generation, will ever be enough for some environmentalist) and use the current round of reductions as they did last time to justify even lower limits, makes it almost impossible for any business to do anything. The next two years will be critical as we move to either get to comply with a final Boiler MACT rule and stay in business, or not, or start again with Boiler MACT round three -- Ground Hog Day 3. I am looking forward to seeing you in May in Hershey. I understand chocolate is supposed to be good for you.

## We're happy to Profile the Following CIBO Members:



Karges-Faulconbridge, Inc. (KFI) is a recognized industry leader in process and facility infrastructure design and performance. KFI is focused on facilities and process engineering, commissioning, building performance and field services. We serve clients in the United States, Canada and Central America and have capabilities that are not commonly found in traditional engineering firms, including our commissioning work and our ability to drive projects of all sizes.

We enjoy taking on our clients' most sophisticated projects and solving their problems using elegant, innovative answers. We bring clarity to complexity. KFI has developed a highly trained staff of engineers, technicians and managers who will execute your project with the same care and creativity we would expect if we were the client. Additional information is available on our website: [www.KFIengineers.com](http://www.KFIengineers.com)

Continue to next page for the Indeck Keystone Energy , LLC Profile



**INDECK Group of Companies**  
**A Single Source Provider of Power Solutions**

The Indeck Group designs and manufactures packaged boilers "A", "O", "D" Type, Modular "D" type packaged and field-erected boilers, International Lamont line of High Temperature Hot Water Generators, and auxiliary equipment. Indeck has over 5,000 successful boiler installations in 45 countries.

Indeck Power Equipment Company has rental power equipment available for emergencies, scheduled outages, or increased capacity requirements to 250,000 pph. Indeck supplies mobile steam systems, trailer designed watertube boilers, diesel generators, air and water cooled chillers and emergency deaerators. Indeck provides aftermarket parts and services: fans, burner, trim, UL listed controls for burner, combustion management and feedwater control, stacks, valves and emission reduction equipment.

Indeck's boiler design group, Indeck Keystone Energy has a engineered steam solutions history dating back to the 1840's as Erie City Iron Works, Zurn Energy Division, and Aalborg Industries. The top industry trade names of Volcano, Erie City, Zurn Energy, Aalborg (land based boilers), IBC and International Boiler Works are all under one roof at Indeck. Indeck Keystone Energy specializes in the design of solid fuel and waste heat recovery boilers and larger modular packaged boilers rated up to 1,000,000 PPH and 1,800psig.

Indeck maintains a comprehensive OEM spare parts inventory and 24-hour availability to facilitate plant operations.

Websites include: [www.indeck.com](http://www.indeck.com), [www.indeck-keystone.com](http://www.indeck-keystone.com), [www.indeckenergy.com](http://www.indeckenergy.com)