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Regulatory Compliance: Driving Forces

Bill Miller, Field Technical Services Consultant for Neundorfer, speaks with Mae Kowalke, Neundorfer's Manager of Stories, about the driving forces behind regulatory compliance decisions made at utilities and industrial plants. Get more episodes and join the conversation on iTunes or at www.neundorfer.com/podcast.

Mae: Bill, let's start by having you share with our listeners a little bit about your background and expertise.

Bill: For the last forty years I've been involved in every make and model of electrostatic precipitator for public utilities and general industry. That includes travel to many, many places-- Canada, United States, South America, Scandinavia, Europe. I started with Research Cottrell in 1966 and have worked with, as a consultant, BELCO, BHA, and FMDK Technologies. Now, I am with Neundorfer.

Mae: Broadly speaking, what do you see as the main driving forces behind decisions being made about regulatory compliance at plants that are using electrostatic precipitators?

Bill: To start with, the majority of the machines I've had the opportunity to work on were put in during the mid to late 1970s, up to the 1980s. They are undersized for today's regulations. The choice plants have to make is: Do we upgrade them? Or, do we replace them? In most instances, upgrades are available that can bring them into compliance, such as computerized modeling, physical modeling of gas flow, and controls upgrades. But it's very difficult because the decisions are on this parasitic device called an electrostatic precipitator. It makes them no money. Unless there are some people, or a group, dedicated to it, it will fall into disrepair.

Mae: More specifically, what do you see as the forces impacting short-term and long-term thinking around these decisions.

Bill: Well, what will happen with MACT, which is supposed to come into effect in 2015, is really an uncertainty for the majority of public utility large power boilers. Also, there are the Title 5 operating permits for various plants. Some have renewal dates of 2012, 2013, 2014. But, the MACT rules will override those. So there are discussions to be undertaken to set forth a real plan to look at the devices and what we can do overall, from the boiler through the stack.

Mae: Let's get back to the question of replacement versus rebuild. Why might someone choose one option over the other?

Bill: An upgrade generally takes a lot of resources, to come up with a workable plan and economic benefit. For replacements, the general trend has been, *The electrostatic precipitator is under-performing and we'll replace it either with a larger electrostatic precipitator or a fabric filter.*

Mae: What advice would you give to a plant decision maker who is struggling to make sense of the regulatory changes and how to be proactive?

Bill: Information is key to this. Having the correct information from various sources and especially a full service organization, such as Neundorfer, can lead to information being correct. For instance, is your boiler operating correctly? Is your air heater operating correctly? These are on the front end of the pollution control devices. Carefully evaluating all of these options is resource-intensive. But, an upgrade would be far less expensive than a replacement.

Mae: How do you see the driving forces we've been talking about changing in the next 5-10 years.

Bill: First, there's going to be fear. Fear is the biggest driving force. Something is changing. *Our machine that's been operating for ten or twenty years met the requirements, but now I don't know what's going to happen.* It's best to take a look at the entire process and be well-informed when these regulations come forth, that this is the direction we're going to take.