

comments on 10/5/05 draft

1. p.2 - what is meant by "active" control technologies : SNCR,....
2. p.5 - The discussion on bottom does not pertain to preheater/calcliner kilns and preheater kilns so should describe these systems in a separate paragraph
3. p. 6 - last kiln type at bottom should be dry kilns with preheates and precalciners(or preferably calciners)
4. p.8 -heading for 2.1.3.4 should be dry kilns with precalciners and preheaters
5. p.9 - top -also mention fuel savings for ph/c kiln systems
6. p. 14 why is the use of urea in SCR an advantage? Urea can also be used for SNCR. Also mention disadvantages of SCR
7. p.15 - mention othe NOx controls used at Solnhofen == LNB?
8. p.16 - bottom -ammonia solution by far is the reagent used for SNCR in cemnt kilns.
9. p.18 - near top - where did FL smidth test SNCR.
- 10 . p.18 mention the 2 US plants presently using SNCR - Suwannee American - Florida; Hercules Cement - Shockertown, PA
11. p .18 - provide some info on BSI used at Misibishi Cement,
- 12 p. 19 near top - disagree with statement that SCR and SNCR are sometimes limited in theri use.....
13. Docusment should disciss staged combustion in the calciner(precalciner) Some reuslts in FL show low NOx using SCC
13. Document should discuss the combiantion of controls such as staged combustion with SNCR
- 14, Table 1-1 should present combination of controls such as mention in 13 above.
15. Table 1-1 reducstion for SNCR 71-98% and 10-20% seems too high and too low - suggest 40-70%
16. NOx reduction efficiency for biosol;ids injection is not given. EC/R report says 30- 50%.
- 17 NOx reduction efficiency for NOx Out is all over the map.

thanks

US Environmental Protection Agency
Research Triangle Park, NC 27711
Phone - 919-541-5435
Fax - 919 - 541-0824
E-mail - neuffer.bill@epa.gov

Overnight mail address:
US EPA
Mail Code C539-02
109 TW Alexander Drive
RTP, NC 27709