

CEFCO GLOBAL CLEAN ENERGY, LLC

**McIlvaine Hot Topic Hour**

PRODUCTION OF FERTILIZERS AND  
ACIDS AS BY-PRODUCTS AT  
COAL FIRED POWER PLANTS

Robert E. Tang, CEO and Co-Inventor

January 17, 2013



# CEFCO's Innovative Solution

CO<sub>2</sub> Capture + All-Pollutant Capture = Regulatory Compliance + Renewable & Sustainable Technology + Recovering CAPEX and OPEX

- Use Ewan's shockwave "free-jet collision scrubbing" (recognized by EPA/DOE as HWC MACT in US Regs. 40 CFR §63.1209 et al.) to capture all pollutants
- +
- Cooper Process to convert all "captured pollutants" with Appropriate Reagents into recovered, segregated, valuable, and sellable End-Products
- =
- Accomplished using Supersonic Shockwave Reaction Mechanism under USPTO Patent issued on November 30, 2010 under: US 7,842,264B2
- **CEFCO Users:**
  - 1) Comply with all EPA's MACT, MATS, NSPS and NESHAPs Requirements
  - 2) Benefit of selling End-Products ≈ no longer "cost-center" ↔ recover OPEX + CAPEX
  - 3) New Economic Paradigm in the Power Co-generation World.

# Ewan Technology: EPA MACT Compliant

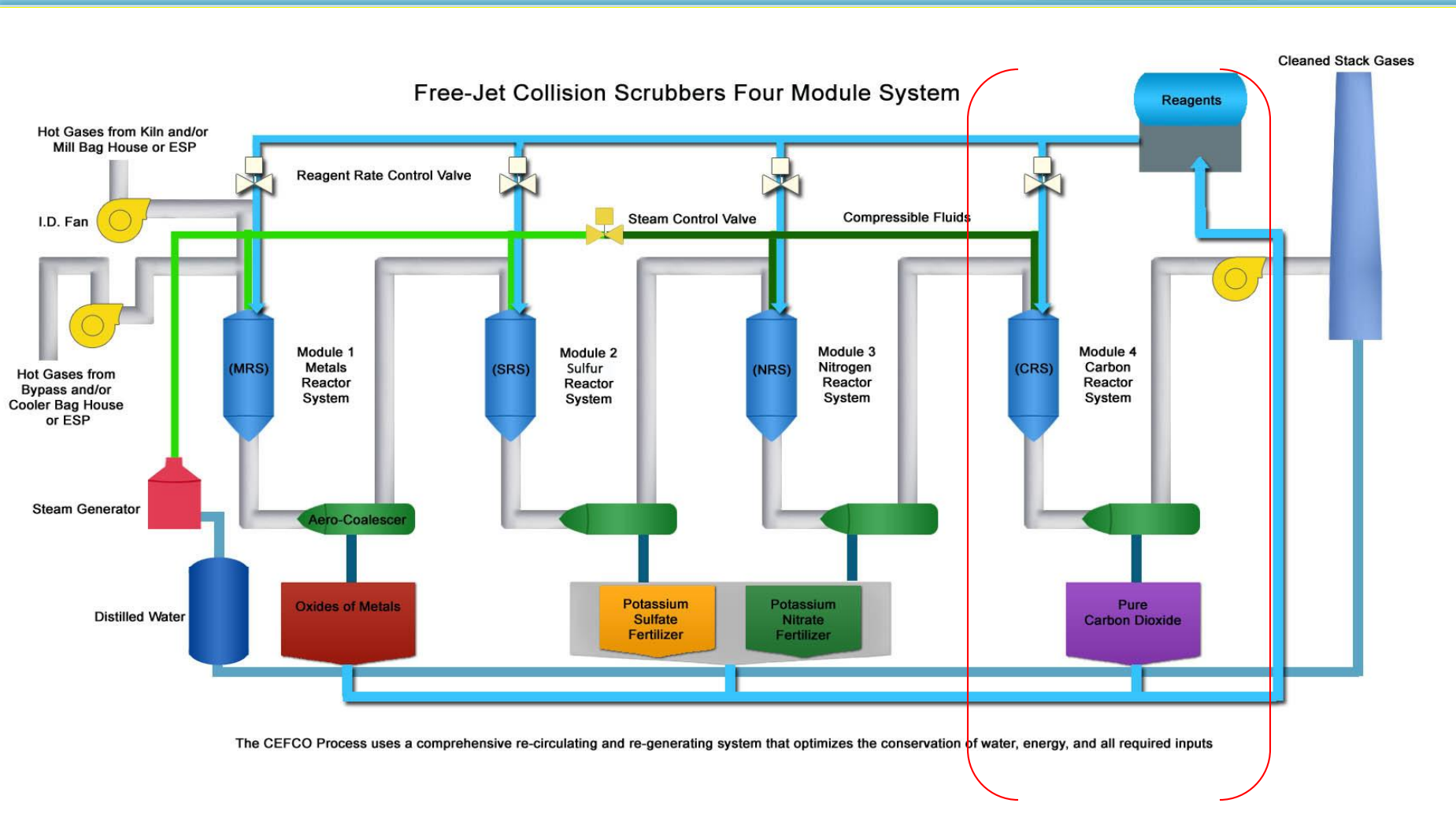
Date	Reference No.	Report Title	Emissions Targets	Description of Tests	Performance Conclusion
April 1, 1974	EPA-650/2-74-028 (Dale L. Harmon, EPA-NERC-RTP)	Steam-Hydro Air Cleaning System Evaluation	0.03 micron to 5.0 micron (EPA Method 5)	Steam-Hydro Patent invented by T.K. Ewan sold and assigned to Lone Star Steel (Div. of US Steel)	"90.0% at 0.01 micron . . . . 99.9% at 0.5 micron and 99.99% at 1.0 micron"
Oct. 1976	NCASI — Special RTP	Kraft Recovery of TRS Emissions	Total Reduced Sulfur, H <sub>2</sub> S, CO <sub>2</sub>	"... near instantaneous . . . tremendous surface area for gas-liquid contact . . . 50 x 10 <sup>3</sup> sec."	"TRS emissions were reduced to less than 2 ppm during total run", "quite successful . . . it is recommended to test for SO <sub>2</sub> removal also"
Sept. 1977	EPA- 600/2-77 -193 under Dennis C. Drehmel, EPA, Research Triangle Park	EPA/600/13 Code	Contract 68-02-2190: Particulates, H <sub>2</sub> S, SO <sub>2</sub>	"High performance with low energy requirement is achieved by the use of free-	"... well below the 0.0052 grains/SCF... effective removal of hydrophobic fumed silica having particle diameter

- EPA published its "Guide to Phase I MACT Compliance" for Hazardous Waste Combustors MACT — **May 22, 2002**
- Ewan's Technology was Federally recognized and codified in 40 CFR §63.1209

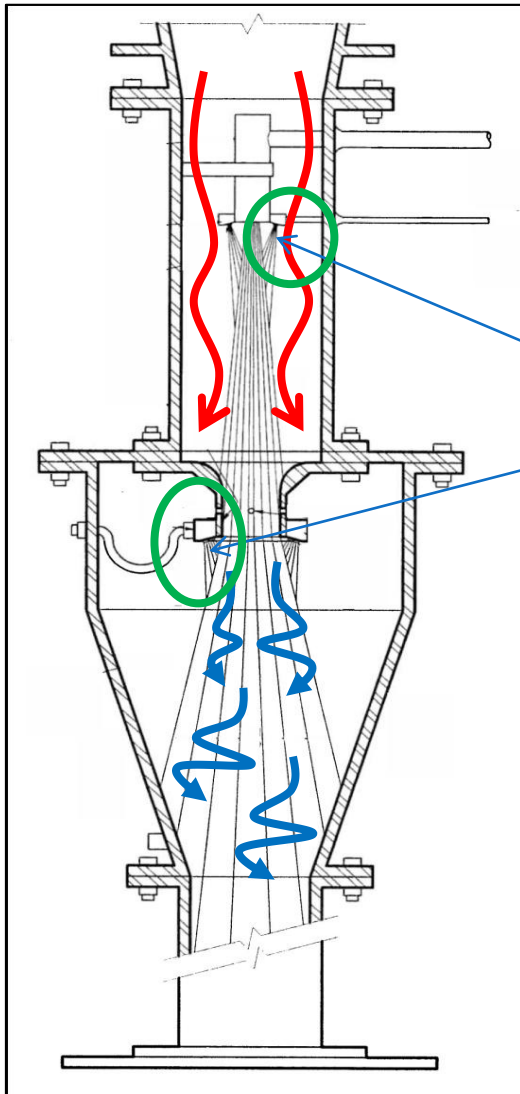
Date	Reference No.	Report Title	Emissions Targets	Description of Tests	Performance Conclusion
July, 1986	EPA- 600/S2-86 -011 <i>[this is a head-to-head test vs. equipment and technology provided by ETS, Inc. and Vulcan Engineering]</i>	EPA Hazardous Waste Engineering Research Lab, Cincinnati, OH	APCD, PM, HCl, SO <sub>2</sub> , SO <sub>3</sub>	"supersonic tandem nozzle . . .", "most effective of the versions tested for control of submicron particulate matter"	Page 2: "uranium hexafluoride and its hydrolysis products with particulate removal efficiency consistently exceeding 99%"; Page 3: "chloride removal of 99% or better should be expected for any version of this unit [vs. both competitors]."
Sept. 1992	DOE PNL-8281	DE-AC06-76RIO 1830 by Battelle Memorial Institute	Hanford Radioactive Waste Incineration	Performance per Office of Solid Waste Emergency Response (OSWER) Directive 9335.3-01	"... cesium-137 was greater than 99.98%"; other metals, acids and organics "greater than 99.99%"

Date	Reference No.	Report Title	Emissions Targets	Description of Tests	Performance Conclusion	
August 1993	DE-AC01-EW300-30					
1993	WSRC-TR-93-00623					
Feb. 1996	EPA Contract No. 68-D2-0164					
1997	CERCLIS #: MOD980685226 EPA Remedial Project Manager: Robert W. Field U.S. EPA Region 7 Kansas City, KS 66101	On-Site Incineration at the Times Beach Superfund Site (Times Beach, Missouri)		Dioxins, TCDD ("Agent Orange")	CEMS measures: O <sub>2</sub> , CO <sub>2</sub> , NO <sub>x</sub> , CO, and SO <sub>2</sub> . Acids, metals and minerals. Continuous recording.	MACT Compliance. "Resource Conservation and Recovery Act (RCRA): DRE of 99.9999% for TCDD. Stack gas monitoring was conducted for oxygen and carbon monoxide in accordance with 40 CFR Part 264, Subpart O."
July 1998	DOE/ID-10651, Rev.1	Hazardous and Radioactive Waste Treatment Technologies Handbook		PM, Hg, ROW (Radioactive Organic Waste), BRW (Blended Radioactive Waste)	Consolidated Incineration under SVM (Semi-Volatile Metals) + LVM (Low Volatile Metals) Standards	MACT Compliance, and Toxic Substances Control Act Incinerator (TSCAI)
May 22, 2002	40 CFR §63.1209 (m) and §63.1209 (o)	A Guide to Phase I MACT Compliance — May 22, 2002		PM, acids, HCl and Chlorine Gas		"hydrosonic, collision, or free-jet wet scrubber"
unspecified	DOD/DOE docs			controlled	At National Labs	Internal GOV official and formal EPA request

# CEFCO — System Flow Diagram



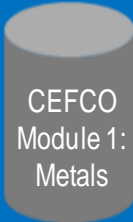
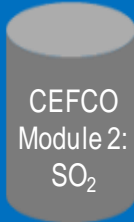
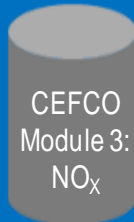
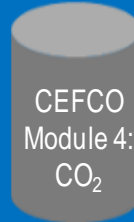
# CEFCO's Unique Reaction Mechanism



- All **flue gas** must pass downward through Shockwaves → “**no escape**” from “free-jet collision” reaction mechanism
- Shockwave-generated molecular collision causes **Energy Transfer in the immediate Endothermic Reaction**
- Shockwave collision smashes fine Reagent droplets into micro-droplets
- Molecular Surface Chemistry between Target-Molecule with Reagent-Molecule within “split-second”
- Under Shockwave is very **Adiabatic Condition** catalyzing and driving the reaction completion and ending in **Exothermic Reaction “locking in Product”**
- **Pollutants are captured using Physics first, then converted into valuable end-products using Chemistry**

# Profit from Valuable End-Product Sale

Sequenced modules selectively capture distinct and Valuable Products from Pollutants.

	 <p>CEFCO Module 1: Metals</p>	 <p>CEFCO Module 2: SO<sub>2</sub></p>	 <p>CEFCO Module 3: NO<sub>x</sub></p>	 <p>CEFCO Module 4: CO<sub>2</sub></p>
Final Products	Metal Compounds (Mercury & Trace Metals)  Significantly below PM <sub>10.0</sub>	Potassium Sulfate (Fertilizer)	Potassium Nitrate (Fertilizer)	Pure CO <sub>2</sub>
Potential Revenue Streams	<ul style="list-style-type: none"> <li>• Metals Market</li> <li>• Alloy-Steel Users</li> <li>• Industrial Market</li> <li>• Trace Metals for Hi-Tech Electronics Users</li> <li>• Catalysts and Additives for Refining &amp; Petrochemical Sectors</li> </ul>	<ul style="list-style-type: none"> <li>• Fertilizers &amp; Agricultural Applications</li> <li>• Industrial Market</li> <li>• Feedstock for Petrochemical Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Fertilizers &amp; Agricultural Applications</li> <li>• Industrial Market</li> <li>• Feedstock for Petrochemical Sector</li> </ul>	<ul style="list-style-type: none"> <li>• Enhanced Oil Recovery</li> <li>• Sequestration Market</li> <li>• Carbon Credit</li> <li>• Methanol, Ethanol &amp; Diesel Fuels</li> <li>• Feedstock for Petrochemical Sector</li> </ul>



Captured Toxic and Trace Metals from Coal Gases - Very Valuable



# MRS — Trace Metal Capture Mechanism

- Analysis of Coal-Fired and Pet-Coke Emissions show ~40 different kinds of metals and minerals → **Neutralized Valuable Trace Metals and Minerals can be recovered and could reduce Importation from Overseas Countries**
- Capture Mechanism: molecular surface area interaction between Pollutant and Reagent
  - Use of Steam: Shockwave shattering Steam's or Reagent's contact surface area to become multiplied thousands and thousands of times
  - Micro-droplets contact and envelope Targeted Pollutant and reform as moisture-encapsulated droplets
  - Capturing Product Reactions completed in split-seconds
- **Molecular surface chemistry overcomes conventional mass transfer limitations — virtually all Metals and Particulates are captured** (per EPA/DOE)



# Reaction Speeds under Shockwave Reaction Condition and Priorities in CEFCO Modules

#	Priority of Reaction Preference	Enthalpy [ $\Delta H_f^\ominus$ ]	Time (Sec.)
<b>1</b> <b>SRS</b>	Prior SOx + H <sub>2</sub> O + O <sub>2</sub> Reactions <sup>1</sup> all Produce H <sub>2</sub> SO <sub>4</sub> Acids (very exothermic): 2KOH + H <sub>2</sub> SO <sub>4</sub> → K <sub>2</sub> SO <sub>4</sub> + 2H <sub>2</sub> O	Definitely will react very fast. [H <sub>2</sub> SO <sub>4</sub> ΔH = -811.3 kJ/mol] + [ΔH = -342 kJ/mol] = Combined: [ΔH = -1,153.3 kJ/mole]	10 <sup>-4</sup>
<b>2</b> <b>NRS</b> <b>H<sub>2</sub>O<sub>2</sub></b>	(Eq. 1) 2 NO + 3 H <sub>2</sub> O <sub>2</sub> → 2 HNO <sub>3</sub> + 2 H <sub>2</sub> O (Eq. 2) 2 HNO <sub>3</sub> + 2 KOH → 2 KNO <sub>3</sub> + 2 H <sub>2</sub> O (Eq. 3) 2 NO + 3 H <sub>2</sub> O <sub>2</sub> + 2 KOH → 2 KNO <sub>3</sub> + 4 H <sub>2</sub> O	[ΔH = -940 kJ/mol]  Definitely will react fast.	10 <sup>-3</sup>
<b>NRS<sub>O<sub>2</sub></sub><sup>2</sup></b> <b>Oxid.</b> <b>2a</b>	(Eq. 1) 2 NO + O <sub>2</sub> → 2 NO <sub>2</sub> (Eq. 2) 2 NO <sub>2</sub> + 2 H <sub>2</sub> O → 2 HNO <sub>3</sub> + H <sub>2</sub> (Eq. 3) 2 HNO <sub>3</sub> + 2 KOH → 2 KNO <sub>3</sub> + 2 H <sub>2</sub> O (Eq. 4) 2 NO + O <sub>2</sub> + 2 KOH → 2 KNO <sub>3</sub> + H <sub>2</sub>	Hess's Law Bond Enthalpy Calculations (gas as neutral):  [ΔH = -172 kJ/mol]	10 <sup>-2</sup>
<b>NRS<sub>O<sub>2</sub></sub></b> <b>2b</b>	2 NO + O <sub>2</sub> + 2 KOH → 2 KNO <sub>3</sub> + H <sub>2</sub>	Bond Enthalpy Calcs (+ adding gas bonds): [ΔH = -234 kJ/mol]	10 <sup>-2</sup>
<b>NRS<sub>O<sub>2</sub></sub></b> <b>2c</b>	2 NO + O <sub>2</sub> + 2 KOH → 2 KNO <sub>3</sub> + H <sub>2</sub>	Standard Enthalpy Text Book Calculations: [ΔH = -205.76 kJ/mol]	10 <sup>-2</sup>
<b>NRS<sub>O<sub>2</sub></sub></b> <b>2d</b>	HNO <sub>3</sub> + KOH → KNO <sub>3</sub> + H <sub>2</sub> O	Empirical Test Data: [ΔH = -181 kJ/mol]	10 <sup>-2</sup>
<b>NRS<sub>O<sub>2</sub></sub></b>	Average of 4 O <sub>2</sub> Oxid. Routes	<b>-198.19 kJ/mole</b>	10 <sup>-2</sup>

<sup>1</sup> # 1a: SO + H<sub>2</sub>O → SO<sub>2</sub> + H<sub>2</sub> + O<sub>2</sub> → H<sub>2</sub>SO<sub>4</sub> [ΔH = -811.3 kJ/mol]

# 1b: SO<sub>2</sub> + H<sub>2</sub>O → H<sub>2</sub>SO<sub>3</sub> + ½ O<sub>2</sub> → H<sub>2</sub>SO<sub>4</sub> [ΔH = -811.3 kJ/mol]

# 1c: SO<sub>3</sub> + H<sub>2</sub>O → H<sub>2</sub>SO<sub>4</sub> [ΔH = -811.3 kJ/mol]

<sup>2</sup> Substituting O<sub>2</sub> Gas in place of H<sub>2</sub>O<sub>2</sub> Peroxide may save Chemical Input Cost. The NRS reactions will be less exothermic and a bit slower. Will produce the same K<sub>2</sub>NO<sub>3</sub> Fertilizer results.



# Fertilizer Making — SRS (SO<sub>x</sub>) Module

## Endo-then-Exothermic Reactions inside the Aerodynamic Reactor

### System:

- SO and SO<sub>3</sub> may exist in very small quantities in Flue Gas — can be oxidized very rapidly by injecting O<sub>2</sub> (or H<sub>2</sub>O<sub>2</sub>)
- Vast Majority ends up as SO<sub>2</sub> in Flue Gas:
- SO<sub>2</sub> + H<sub>2</sub>O → H<sub>2</sub>SO<sub>3</sub>
- 2H<sub>2</sub>SO<sub>3</sub> + O<sub>2</sub> (or H<sub>2</sub>O<sub>2</sub>) → 2H<sub>2</sub>SO<sub>4</sub> (Sulfuric Acid)
- H<sub>2</sub>SO<sub>4</sub> + 2 KOH (reagent) → K<sub>2</sub>SO<sub>4</sub> + 2 H<sub>2</sub>O (Valuable and Sellable Reaction Products, especially in dry-climate farming areas)
- See: “Oxidation” and “Exothermic” Reactions

Any cheaper Alkaline (Na) or Alkaline Metal (Ca) Base Reagent will work for Regulatory Compliance making a salt by-product for disposal, **but only Potassium Reagent makes high-value and sellable Fertilizer-Product**

# Fertilizer Making — NRS (NO, NO<sub>x</sub>) Module

## Endo-then-Exothermic Reactions inside the Aerodynamic Reactor System :

- $2 \text{NO} + 2 \text{H}_2\text{O}_2$  (reagent) (or  $\text{O}_2$ )  $\rightarrow$   $2 \text{NO}_2 + \text{H}_2\text{O}$
- $2 \text{NO}_2 + \text{H}_2\text{O} \rightarrow \text{HNO}_2 + \text{HNO}_3$
- $2 \text{NO}_2 + \text{H}_2\text{O}_2$  (reagent) (or injecting  $\text{O}_2$ )  $\rightarrow$   $2 \text{HNO}_3$  (Nitric Acid itself is a Product, but of lesser value than Fertilizer)
- $\text{KOH}$  (reagent) +  $\text{HNO}_3 \rightarrow \text{KNO}_3 + \text{H}_2\text{O}$  (Valuable Fertilizer and Water Products, as better choice than Ammonium Nitrate being banned in EU)

## Transient Reactions (Hess's Law is verified):

- $\text{KOH}$  (reagent) +  $\text{HNO}_2 \rightarrow \text{KNO}_2 + \text{H}_2\text{O}$
- $\text{KNO}_2 + \text{H}_2\text{O}_2$  (reagent) (or injecting  $\text{O}_2$ )  $\rightarrow$   $\text{KNO}_3 + \text{H}_2\text{O}$  (Valuable Fertilizer and Water Products)
- See: "Oxidation" and "Exothermic" Reactions

Any cheaper Alkaline (Na) or Alkaline Metal (Ca) Base Reagent will work for Regulatory Compliance making a salt by-product for disposal, **but only Potassium Reagent makes high-value and sellable Fertilizer-Product**

# Successful Capture of Potassium Fertilizers



# SO<sub>2</sub> and NO<sub>x</sub> are Captured and Converted into Valuable and Sellable Fertilizers



Potassium Sulfate Fertilizer =  
 $K_2SO_4$  (Solid)



Potassium Nitrate Fertilizer =  
 $KNO_3$  (Solid)

- 99+% Pure  $K_2SO_4$  (Solid) is sold around \$3,000/ton to Wholesale Distributors in the dry-climate farming areas of the world.
- 99+% Pure  $KNO_3$  (Solid) is sold around \$2,000 to \$3,000/ton to Wholesale Distributors, being a likely substitute or blend-in for Ammonium Nitrate in the global market, starting with the EU.

# Potential Range of \$ Revenue from Products at 3 Kinds of Typical 1,000 MW Coal-Fired Power Plant

<b>PRB Coal: End-Products Manufactured for Sale</b>						
Produced Item	Tons /1,000 MW Capacity	Tons / MWe Cap.	Ton/Per ACFM	Ton/Per Oper. Hour	\$ Selling Price/Ton	\$ Revenue/8,000 Hrs.
Trace Metals	1,144	1.14	0.002383	0.142952	\$20,000	\$22,872,333
K2SO4 Fertilizer (pure)	69,238	69	0.144246	8.654750	\$3,000	\$207,714,000
KNO3 Fertilizer (pure)	22,500	23	0.046875	2.812500	\$2,500	\$56,250,000
CO2 (pure = KHCO3 solid)	7,919,705	7,920	16.499385	989.963125	\$0	\$0
H2O Produced	3,241,893	3,242	6.753944	405.236625	\$3.00	\$9,725,679
K2CO3	24,870,470	24,870	51.813479	3,108.808750	\$0	\$0
<b>Totals:</b>						<b>\$296,562,012</b>

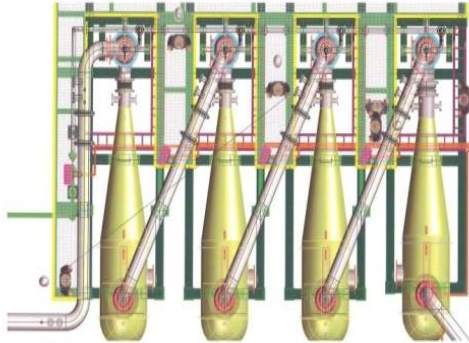
<b>Illinois-Ohio Basin Hi-Sulfur Coal: End-Products Manufactured for Sale</b>						<b>High Quantity S</b>
Produced Item	Tons /1,000 MW Capacity	Tons / MWe Cap.	Ton/Per ACFM	Ton/Per Oper. Hour	\$ Selling Price/Ton	\$ Revenue/8,000 Hrs.
Trace Metals	1,372	1.37	0.002859	0.171543	\$25,000	\$34,308,500
K2SO4 Fertilizer (pure)	533,238	533	1.110913	66.654750	\$3,000	\$1,599,714,000
KNO3 Fertilizer (pure)	41,587	42	0.086640	5.198375	\$2,500	\$103,967,500
CO2 (pure = KHCO3 solid)	7,593,345	7,593	15.819469	949.168125	\$0	\$0
H2O Produced	3,108,299	3,108	6.475623	388.537375	\$3.00	\$9,324,897
K2CO3	23,845,592	23,846	49.678317	2,980.699000	0	\$0.00
<b>Totals:</b>						<b>\$1,747,314,897</b>

<b>No. Dakota Lignite Coal: End-Products Manufactured for Sale</b>						<b>Med. Quantity S</b>
Produced Item	Tons /1,000 MW Capacity	Tons / MWe Cap.	Ton/Per ACFM	Ton/Per Oper. Hour	\$ Selling Price/Ton	\$ Revenue/8,000 Hrs.
Trace Metals	754.787	0.75	0.001572	0.094348	\$30,000	\$22,643,610
K2SO4 Fertilizer (pure)	193,200	193	0.402500	24.150000	\$3,000	\$579,600,000
KNO3 Fertilizer (pure)	22,529	23	0.046935	2.816125	\$2,500	\$56,322,500
CO2 (pure = KHCO3 solid)	10,464,578	10,465	21.801204	1,308.072250	\$0	\$0
H2O Produced	4,283,625	4,284	8.924219	535.453125	\$3.00	\$12,850,875
K2CO3	32,862,206	32,862	68.462929	4,107.775750	0	\$0.00
<b>Totals:</b>						<b>\$671,416,985</b>

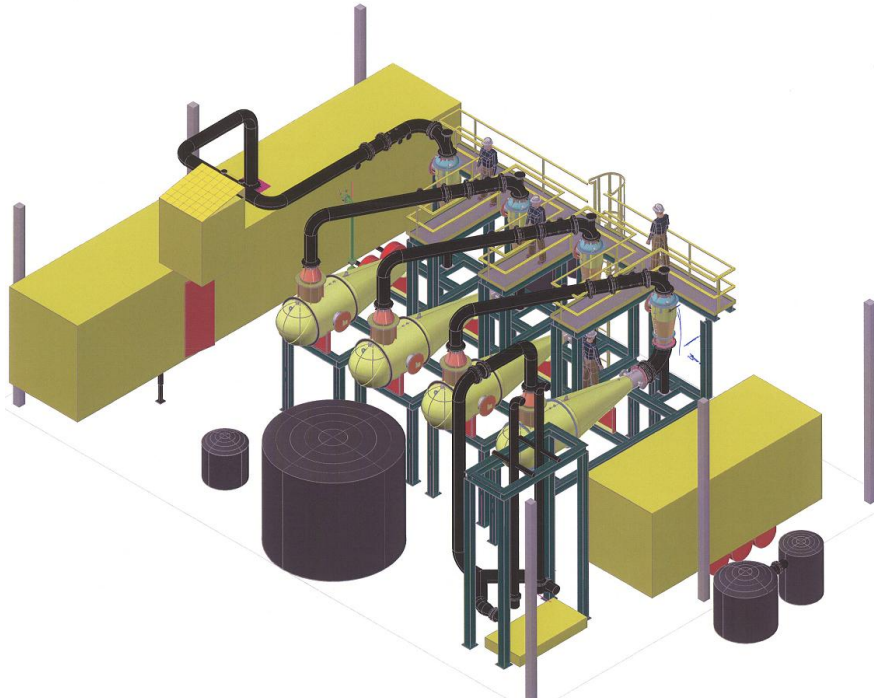


# Pilot Plant at Peerless in Wichita Falls, TX

(Modules → Ready for Commercialization)



- Phase I Success announced in November 9, 2011 Press Release by Peerless Mfg. Co.
- Seeking Phase II Demo-Partner for Carbon Capture in CRS



# Pilot Plant in Wichita Falls, TX

10-Minute Video available in Website: [www.cefcoglobal.com](http://www.cefcoglobal.com)



# Executive Summary

- CEFCO's Modules Commercialization → MACT, MATS, CAIR and NESHAPs Compliance on a timely basis
- Pollution Control = “profit-generation” business; ≠ “cost-center”
- Reliable and affordable:
  - Game-changing “transformative” (described by DOE) reaction mechanism technology = low-cost substitute for traditional thermodynamics and catalysts
- **SO<sub>2</sub>** and **SO<sub>x</sub>** can be Captured as a Potassium Sulfate Fertilizer, and Sold to Distributors and Users
- **NO<sub>x</sub>** can be Captured as a Potassium Nitrate Fertilizer, and Sold to Distributors and Users
- “Virtuous Recycling” — of a Toxic Pollutants into a meritorious Fertilizer at Coal-Fired and Gas-Fired Power Plants to become Co-Generation of Electricity and Sellable Products in “renewable + sustainable” cycles



# Questions & Answers

Thank you very much for your attention.

Please Contact Us At:

For Robert Tang: [robert.tang@cefcoglobal.com](mailto:robert.tang@cefcoglobal.com)

Website: [www.cefcoglobal.com](http://www.cefcoglobal.com)

# Appendix 1a — EPA and DOE Reports on Ewan Technology (1974 to 1986)

<u>Date</u>	<u>Reference No.</u>	<u>Report Title</u>	<u>Emissions Targets</u>	<u>Description of Tests</u>	<u>Performance Conclusion</u>
April 1, 1974	EPA-650/2-74-028 (Dale L. Harmon, EPA-NERC RTP)	Steam-Hydro Air Cleaning System Evaluation	0.03 micron to 5.0 micron (EPA Method 5)	Steam-Hydro Patent invented by T.K. Ewan sold and assigned to Lone Star Steel (Div. of US Steel)	"90.0% at 0.01 micron . . . 99.9% at 0.5 micron and 99.99% at 1.0 micron"
Oct. 1976	NCASI — Special RTP	Kraft Recovery of TRS Emissions	Total Reduced Sulfur, H <sub>2</sub> S, CO <sub>2</sub>	". . . near instantaneous . . . tremendous surface area for gas-liquid contact . . . 50 x 10 <sup>-3</sup> sec."	"TRS emissions were reduced to less than 2 ppm during total run", "quite successful . . . it is recommended to test for SO <sub>2</sub> removal also"
Sept. 1977	EPA- 600/2-77 -193 under Dennis C. Drehmel, EPA, Research Triangle Park	EPA/600/13 Code	Contract 68-02-2190: Particulates, H <sub>2</sub> S, SO <sub>2</sub>	"High performance with low energy requirement is achieved by the use of free- jet . . ."	". . . well below the <b>0.0052 grains /SCF</b> ...effective removal of hydrophobic fumed silica having a near uniform <b>particle diameter of 0.007 microns</b> . This material rejects water. Analysis of the captured material shows the particulate not wetted, but encapsulated in a film of water."
Feb. 10, 1986	DCN 86-213-071-03	Radian Corp. Technical and Economic Evaluation for MSW Incineration	MSW, PM, HCl, SO <sub>2</sub> , SO <sub>3</sub>	"proven below 0.02 grains/scf", "achieved 99% HCl removal". "using slaked lime reagent . . . 95% SO <sub>2</sub> removal"	"shows overall capital cost and total annual operating cost advantage over spray scrubbing systems, using either ESP or FF particulate matter collection"

# Appendix 1b — EPA and DOE Reports on Ewan Technology (1986 to 1996)

<u>Date</u>	<u>Reference No.</u>	<u>Report Title</u>	<u>Emissions Targets</u>	<u>Description of Tests</u>	<u>Performance Conclusion</u>
July, 1986	EPA- 600/S2-86 -011 [this is a head-to-head test vs. equipment and technology provided by ETS, Inc. and Vulcan Engineering]	EPA Hazardous Waste Engineering Research Lab, Cincinnati, OH	APCD, PM, HCl, SO <sub>2</sub> , SO <sub>3</sub>	“supersonic tandem nozzle . . .”, “most effective of the versions tested for <b>control of submicron particulate matter</b> ”	Page 2: “uranium hexafluoride and its hydrolysis products with particulate removal efficiency consistently exceeding 99%”; Page 3: “chloride removal of 99% or better should be expected for any version of this unit [vs. both competitors].”
Sept. 1992	DOE PNL-8281	DE-AC06-76RIO 1830 by Battelle Memorial Institute	Hanford Radioactive Waste Incineration	Performance per Office of Solid Waste Emergency Response (OSWER) Directive 9335.3-01	“ . . . cesium-137 was greater than 99.98%”; other metals, acids and organics “greater than 99.99%”
August 1993	DE-AC01-EW300-30	DOE/MWIP-3 by SAIC	PNL — Idaho Labs	undisclosed	undisclosed
1993	WSRC-TR-93-00623	Final Report: Consolidated Incineration Facility by Westinghouse Savannah River Corporation	CIF, POHCs (Principal Organics Hazardous Constituents), Metals, TVOC, Chlorides, PAH (Polynuclear Aromatic Hydrocarbons)	CEMS measures: O <sub>2</sub> , CO <sub>2</sub> , NO <sub>x</sub> , CO, and SO <sub>2</sub> . Continuous recording by strip charts. The CEMS monitored both the PCC and SCC flue gases	<b>Destruction “greater than 99.99998%”</b>
Feb. 1996	EPA Contract No. 68-D2-0164	Technical Support Document for HWC MACT Standards, Vol. I		Page 3-17, Section 3.4.2.2, Page 3-58, Figure 3-14	

# Appendix 1c — EPA and DOE Reports on Ewan Technology (1997 to 2002)

Date	Reference No.	Report Title	Emissions Targets	Description of Tests	Performance Conclusion
1997	CERCLIS #: MOD980685226 EPA Remedial Project Manager: Robert W. Field U.S. EPA Region 7 Kansas City, KS 66101	On-Site Incineration at the Times Beach Superfund Site (Times Beach, Missouri)	Dioxins, TCDD (“Agent Orange”)	CEMS measures: O2, CO2, NOx, CO, and SO2. Acids, metals and minerals. Continuous recording.	MACT Compliance. “Resource Conservation and Recovery Act (RCRA): <b>DRE of 99.9999% for TCDD</b> . Stack gas monitoring was conducted for oxygen and carbon monoxide in accordance with 40 CFR Part 264, Subpart O.”
July 1998	DOE/ID-10651, Rev.1	Hazardous and Radioactive Waste Treatment Technologies Handbook	PM, Hg, ROW (Radioactive Organic Waste), BRW (Blended Radioactive Waste)	Consolidated Incineration under SVM (Semi-Volatile Metals) + LVM (Low Volatile Metals) Standards	MACT Compliance, and Toxic Substances Control Act Incinerator (TSCAI)
May 22, 2002	40 CFR §63.1209 (m) and §63.1209 (o)	A Guide to Phase I MACT Compliance — May 22, 2002	PM, acids, HCl and Chlorine Gas		“hydrosonic, collision, or free-jet wet scrubber”
unspecified	DOD/DOE docs		controlled	At National Labs	Internal GOV official and formal EPA request

**EPA published its “Guide to Phase I MACT Compliance” for Hazardous  
Waste Combustors MACT — May 22, 2002**

Ewan’s Technology was Federally recognized and codified in U.S.  
Regulations: 40 CFR §63.1209 et al.