The author makes an effective case for consideration of existing coal fired boilers for waste incineration. Furthermore, he correctly questions the wisdom of utilizing the smaller fire tube units. This should focus attention on the more viable candidates — those with higher boiler ratings, a greater degree of coal firing, and better furnaces for combustion of wastes.

While his model in the paper is of a pulverized coal fired boiler, we presume a similar effort can be made on behalf of the stoker fired units which substantially outnumber the PC installations (Table 1). The presence of a grate and sustained combustion would appear beneficial.

We raise the question as to what constitutes “waste introduction as a small percentage of primary fuel.” In numerous projects to date, this is often a matter of “cut and try,” due to the variables involved and lack of intelligence gathered from actual operating experience.

While the subject of “incinerator” definition is broached, we suspect the actual writing of many States’ regulations may leave such definition open to varying interpretation. Almost without exception, regulations for a device classed as an “incinerator” are far more stringent than those for a typical coal fired boiler. As such interpretation becomes an “unknown,” the incentive for rehabilitation of a conventional boiler unit for a degree of hazardous waste disposal will wane and the necessary risk capital may not be forthcoming.

The current dearth of information on what is actually being consumed via the suggested cofiring is a two edged sword. On the one hand, not having to report such activity is probably a major promptor to its being done! Once the usual questions as to impact on existing equipment and its operation are rehearsed, the economics are resolved and a “go – no go” situation is established. There is no regulatory morass to negotiate for the “small percentage” of waste involved. Such effort can cause “still birth” of small projects due to the inordinate amount of time which can be involved.

On the other hand, as new boiler units are contemplated (and especially any move toward coal firing), actual operating data would be most beneficial to arriving at the best design logic and minimal environmental impact. In our economic system of Warranty and Guarantee, such information minimizes risk and exposure for both buyer and seller. Bearing in mind the referenced “list of 285 hazardous constituents,” the odds are high for missing a performance guarantee if one is required.

Industrial boilers come in many types and designs with widely differing operating profiles, modus operandi, etc. Gathering a meaningful data base, especially for preparing a regulatory structure, will not be easy, if, in fact, possible.
We concur heartily with the author's stated need for emissions data but question how this can happen in the apparently existing laissez faire climate. Unfortunately, any climate other than this will be a hindrance to making the installations "happen" so that a source for such data exists.