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## **BILL POWERS, P.E.**

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### **PROFESSIONAL HISTORY**

Powers Engineering, San Diego, CA 1994-  
 ENSR Consulting and Engineering, Camarillo, CA 1989-93  
 Naval Energy and Environmental Support Activity, Port Hueneme, CA 1982-87  
 U.S. Environmental Protection Agency, Research Triangle Park, NC 1980-81

### **EDUCATION**

Master of Public Health – Environmental Sciences, University of North Carolina  
 Bachelor of Science – Mechanical Engineering, Duke University

### **PROFESSIONAL AFFILIATIONS**

Registered Professional Mechanical Engineer, California (Certificate M24518)  
 American Society of Mechanical Engineers  
 Air & Waste Management Association

### **TECHNICAL SPECIALTIES**

Twenty-five years of experience in:

- Power plant technology, emissions, and cooling system assessments
- San Diego and Baja California regional energy planning
- Combustion and emissions control equipment permitting, testing, monitoring
- Oil and gas technology assessment and emissions evaluation
- Latin America environmental project experience

### **POWER PLANT TECHNOLOGY, EMISSIONS, AND COOLING SYSTEM ASSESSMENTS**

**IGCC and Low Water Use Alternatives to Eight Pulverized Coal Fired 900 MW Boilers.** Expert for cities of Houston and Dallas on integrated gasification combined cycle (IGCC) as a fully commercial coal-burning alternative to the pulverized coal (PC) technology proposed by TXU for eight 900 MW boilers in East Texas. Also analyzed East Texas as candidate location for CO<sub>2</sub> sequestration due to presence of mature oilfield CO<sub>2</sub> enhanced oil recovery opportunities and a deep saline aquifer underlying the entire region. Presented testimony on the major increase in regional consumptive water use that would be caused by the evaporative cooling towers proposed for use in the PC plants, and that consumptive water use could be lowered by using IGCC with evaporative cooling towers or by using air-cooled condensers with PC or IGCC technology. TXU ultimately dropped plans to build the eight PC plants as a condition of a corporate buy-out.

**Assessment of CO<sub>2</sub> Capture and Sequestration for IGCC Plants.** Author of assessment prepared for a public interest client of CO<sub>2</sub> capture and sequestration options for IGCC plants. The assessment focuses on: 1) CO<sub>2</sub> sequestration performance of operational large-scale CO<sub>2</sub> sequestration projects, specifically the Weyburn CO<sub>2</sub> enhanced oil recovery (EOR) project, and 2) CO<sub>2</sub> EOR as the vehicle to offset the cost of CO<sub>2</sub> capture and serve as the platform for an initial set of U.S. IGCC plants equipped for full CO<sub>2</sub> capture and storage.

**Assessment of IGCC Alternative to Proposed 250 MW Circulating Fluidized Bed (CFB) Unit.** Lead engineer to evaluate IGCC option to proposed 250 MW CFB firing Powder River Basin coal. Project site is in Montana, where CO<sub>2</sub> EOR opportunities exist in the eastern part of the state.

**500 MW Coal-Fired Plant –Air Cooling and IGCC.** Provided expert testimony on the performance of air-cooling and IGCC relative to the conventional closed-cycle wet cooled, supercritical pulverized coal boiler

proposed by the applicant. Steam Pro™ coal-fired power plant design software was used to model the proposed plant and evaluate the impacts on performance of air cooling and plume-abated wet cooling. Results indicated that a conservatively designed air-cooled condenser could maintain rated power output at the design ambient temperature of 90 °F. The IGCC comparative analysis indicated that unit reliability comparable to a conventional pulverized coal unit could be achieved by including a spare gasifier in the IGCC design, and that the slightly higher capital cost of IGCC was offset by greater thermal efficiency and reduced water demand and air emissions.

**Retrofit of SCR to Existing Natural Gas-Fired Units.** Lead expert in successful representation of interests of the city of Carlsbad, California to prevent weakening of an existing countywide utility boiler NO<sub>x</sub> rule. Weakening of NO<sub>x</sub> rule would have allowed a 1,000 MW merchant utility boiler plant located in the city to operate without installing selective catalytic reduction (SCR) NO<sub>x</sub> control systems. Ultimately the plant owner was compelled to comply with the existing NO<sub>x</sub> rule and install SCR on all five boilers at the plant. This project required numerous appearances before the county air pollution control hearing board to successfully defend the existing utility boiler NO<sub>x</sub> rule.

**Proposed 1,500 MW Pulverized Coal Power Plant.** Provided testimony challenge to air permit issued for Peabody Coal Company's proposed 1,500 MW pulverized-coal fired power plant in Kentucky. Presented case that IGCC is a superior method for producing power from coal, from both environmental and energy efficiency perspective, than the proposed pulverized-coal plant. Presented evidence that IGCC is technically feasible and cost-competitive with pulverized coal.

**Presidential Permits to Two Border Power Plants – Contested Air and Water Issues.** Provided testimony on the air emissions and water consumption impact of two export power plants, Intergen and Sempra, in Mexicali, Mexico, and modifications necessary to minimize these impacts, including air emission offsets and incorporation of air cooling. These two plants are located within 3 miles of the California border, are interconnected only to the SDG&E transmission grid, and under the local control of the California Independent System Operator. Provided evidence that the CAISO had restricted the amount of power these two plants could export when commercial operation began in June 2003 to avoid unacceptable levels of transmission congestion on SDG&E's transmission system. The federal judge determined that the DOE had conducted an inadequate environmental assessment before issuing the Presidential Permits for these two plants and ordered the DOE to prepare a more comprehensive assessment.

**300 MW Coal-Fired Circulating Fluidized Bed Boiler Plant - Best Available NO<sub>x</sub> Control System.** Provided testimony in dispute in case where approximately 50 percent NO<sub>x</sub> control using selective non-catalytic reduction (SNCR) was accepted as BACT for a proposed 300 MW circulating fluidized bed (CFB) boiler plant in Kentucky. Presented testimony that SNCR was capable of continuous NO<sub>x</sub> reduction of greater than 70 percent on a CFB unit and that low-dust, hot side selective catalytic reduction (SCR) and tail-end SCR were technically feasible and could achieve greater than 90 percent NO<sub>x</sub> reduction.

**Conversion of Existing Once-Through Cooled Boilers to Wet Towers, Parallel Wet-Dry Cooling, or Dry Cooling.** Prepared preliminary design for the conversion of four natural gas and/or coal-fired utility boilers (Unit 4, 235 MW; Unit 3, 135 MW; Unit 2, 65 MW; and Unit 1, 65 MW) from once-through river water cooling to wet cooling towers, parallel wet-dry cooling, and dry cooling. Major design constraints were available land for location of retrofit cooling systems and need to maintain maximum steam turbine backpressure at or below 5.5 inches mercury to match performance capabilities of existing equipment. Approach temperatures of 12 °F and 13 °F were used for the wet towers. SPX Cooling Technologies F-488 plume-abated wet cells with six feet of packing were used to achieve approach temperatures of 12 °F and 13 °F. Annual energy penalty of wet tower retrofit designs is approximately 1 percent. Parallel wet-dry or dry cooling was determined to be technically feasible for Unit 3 based on straightforward access to the Unit 3 surface condenser and available land adjacent to the boiler.

**Utility Boiler – Assessment of Closed-Cycle Cooling Retrofit Cost for 1,200 MW Oil-Fired Plant.**

Prepared an assessment of the cost and feasibility of a closed-cycle wet tower retrofit for the 1,200 MW Roseton Generating Station in New York. Determined that the cost to retrofit the Roseton plant with plume-abated closed-cycle wet cooling was well established based on cooling tower retrofit studies performed by the original owner (Central Hudson Gas & Electric Corp.) and subsequent regulatory agency critique of the cost estimate. Also determined that elimination of redundant and/or excessive budgetary line items in owners cost estimate brings the closed-cycle retrofit in line with expected costs for comparable new or retrofit plume-abated cooling tower applications. Closed-cycle cooling has been accepted as an issue that will be adjudicated.

**2,000 MW Nuclear Power Plant – Closed-Cycle Cooling Retrofit Feasibility.** Prepared assessment of the cost and feasibility of a closed-cycle wet tower retrofit for the 2,000 MW Indian Point Generating Station in New York. Determined that the most appropriate arrangement for the hilly site would be an inline plume-abated wet tower instead of the round tower configuration analyzed by the owner. Use of the inline configuration would allow placement of the towers at numerous sites on the property with little or need for blasting of bedrock, greatly reducing the cost of the retrofit. Also proposed an alternative circulating cooling water piping configuration to avoid the extensive downtime projected by the owner for modifications to the existing discharge channel.

**Best Available NO<sub>x</sub> Control System for 525 MW Coal-Fired Circulating Fluidized Bed Boiler Plant.**

Provided testimony in dispute over whether 50 percent NO<sub>x</sub> control using selective non-catalytic reduction (SNCR) constituted BACT for a proposed 525 MW circulating fluidized bed (CFB) boiler plant in Pennsylvania. Presented testimony that SNCR was capable of continuous NO<sub>x</sub> reduction of greater than 70 percent on a CFB unit and that tail-end selective catalytic reduction (SCR) was technically feasible and could achieve greater than 90 percent NO<sub>x</sub> reduction.

**Evaluation of Correlation Between Opacity and PM<sub>10</sub> Emissions at Coal-Fired Plant.** Provided testimony on whether correlation existed between mass PM<sub>10</sub> emissions and opacity during opacity excursions at large coal-fired boiler in Georgia. EPA and EPRI technical studies were reviewed to assess the correlation of opacity and mass emissions during opacity levels below and above 20 percent. A strong correlation between opacity and mass emissions was apparent at a sister plant at opacities less than 20 percent. The correlation suggests that the opacity monitor correlation underestimates mass emissions at opacities greater than 20 percent, but may continue to exhibit a good correlation for the component of mass emissions in the PM<sub>10</sub> size range.

**Emission Increases Associated with Retrofit of SCR Existing Coal-Fired Units.** Provided testimony in successful effort to compel an existing coal-fired power plant located in Massachusetts to meet an accelerated NO<sub>x</sub> and SO<sub>2</sub> emission control system retrofit schedule. Plant owner argued the installation of advanced NO<sub>x</sub> and SO<sub>2</sub> control systems would generate > 1 ton/year of ancillary emissions, such as sulfuric acid mist, and that under Massachusetts Dept. of Environmental Protection regulation ancillary emissions > 1 ton/year would require a BACT evaluation and a two-year extension to retrofit schedule. Successfully demonstrated that no ancillary emissions would be generated if the retrofit NO<sub>x</sub> and SO<sub>2</sub> control systems were properly sized and optimized. Plant owner committed to accelerated compliance schedule in settlement agreement.

**1,000 MW Coastal Combined-Cycle Power Plant – Feasibility of Dry Cooling.** Expert witness in on-going effort to require use of dry cooling on proposed 1,000 MW combined-cycle “repower” project at site of an existing 1,000 MW utility boiler plant in central coastal California. Project proponent argued that site was too small for properly sized air-cooled condenser (ACC) and that use of ACC would cause 12-month construction delay. Demonstrated that ACC could easily be located on the site by splitting total of up to 80 cells between two available locations at the site. Also demonstrated that an ACC optimized for low height and low noise would minimize or eliminate proponent claims of negative visual and noise impacts.

## **COMBUSTION AND EMISSIONS CONTROL EQUIPMENT PERMITTING, TESTING, MONITORING**

**EPRI Gas Turbine Power Plant Permitting Documents – Co-Author.** Co-authored two Electric Power Research Institute (EPRI) gas turbine power plant siting documents. Responsibilities included chapter on state-of-the-art air emission control systems for simple-cycle and combined-cycle gas turbines, and authorship of sections on dry cooling and zero liquid discharge systems.

**Air Permits for 50 MW Peaker Gas Turbines – Six Sites Throughout California.** Responsible for preparing all aspects of air permit applications for five 50 MW FT-8 simple-cycle turbine installations at sites around California in response to emergency request by California state government for additional peaking power. Units were designed to meet 2.0 ppm NO<sub>x</sub> using standard temperature SCR and innovative dilution air system to maintain exhaust gas temperature within acceptable SCR range. Oxidation catalyst is also used to maintain CO below 6.0 ppm.

**Kauai 27 MW Cogeneration Plant – Air Emission Control System Analysis.** Project manager to evaluate technical feasibility of SCR for 27 MW naphtha-fired turbine with once-through heat recovery steam generator. Permit action was stalled due to questions of SCR feasibility. Extensive analysis of the performance of existing oil-fired turbines equipped with SCR, and bench-scale tests of SCR applied to naphtha-fired turbines, indicated that SCR would perform adequately. Urea was selected as the SCR reagent given the wide availability of urea on the island. Unit is first known application of urea-injected SCR on a naphtha-fired turbine.

**Microturbines – Ronald Reagan Library, Ventura County, California.** Project manager and lead engineer or preparation of air permit applications for microturbines and standby boilers. The microturbines drive the heating and cooling system for the library. The microturbines are certified by the manufacturer to meet the 9 ppm NO<sub>x</sub> emission limit for this equipment. Low-NO<sub>x</sub> burners are BACT for the standby boilers.

**Hospital Cogeneration Microturbines – South Coast Air Quality Management District.** Project manager and lead engineer for preparation of air permit application for three microturbines at hospital cogeneration plant installation. The draft Authority To Construct (ATC) for this project was obtained two weeks after submittal of the ATC application. 30-day public notification was required due to the proximity of the facility to nearby schools. The final ATC was issued two months after the application was submitted, including the 30-day public notification period.

**Gas Turbine Cogeneration – South Coast Air Quality Management District.** Project manager and lead engineer for preparation of air permit application for two 5.5 MW gas turbines in cogeneration configuration for county government center. The turbines will be equipped with selective catalytic reduction (SCR) and oxidation catalyst to comply with SCAQMD BACT requirements. Aqueous urea will be used as the SCR reagent to avoid trigger hazardous material storage requirements. A separate permit will be obtained for the NO<sub>x</sub> and CO continuous emissions monitoring systems. The ATCs is pending.

**Industrial Boilers – NO<sub>x</sub> BACT Evaluation for San Diego County Boilers.** Project manager and lead engineer for preparation of Best Available Control Technology (BACT) evaluation for three industrial boilers to be located in San Diego County. The BACT included the review of low NO<sub>x</sub> burners, FGR, SCR, and low temperature oxidation (LTO). State-of-the-art ultra low NO<sub>x</sub> burners with a 9 ppm emissions guarantee were selected as NO<sub>x</sub> BACT for these units.

**Peaker Gas Turbines – Evaluation of NO<sub>x</sub> Control Options for Installations in San Diego County.** Lead engineer for evaluation of NO<sub>x</sub> control options available for 1970s vintage simple-cycle gas turbines proposed for peaker sites in San Diego County. Dry low-NO<sub>x</sub> (DLN) combustors, catalytic combustors, high-temperature SCR, and NO<sub>x</sub> absorption/conversion (SCONO<sub>x</sub>) were evaluated for each candidate turbine make/model. High-temperature SCR was selected as the NO<sub>x</sub> control option to meet a 5 ppm NO<sub>x</sub> emission requirement.

**Hospital Cogeneration Plant Gas Turbines – San Joaquin Valley Unified Air Pollution Control District.** Project manager and lead engineer for preparation of air permit application and BACT evaluation for hospital cogeneration plant installation. The BACT included the review of DLN combustors, catalytic combustors, high-temperature SCR and SCONO<sub>x</sub>. DLN combustion followed by high temperature SCR was selected as the NO<sub>x</sub> control system for this installation. The high temperature SCR is located upstream of the heat recovery steam generator (HRSG) to allow the diversion of exhaust gas around the HRSG without compromising the effectiveness of the NO<sub>x</sub> control system.

**Industrial Cogeneration Plant Gas Turbines – Upgrade of Turbine Power Output.** Project manager and lead engineer for preparation of BACT evaluation for proposed gas turbine upgrade. The BACT included the review of DLN combustors, catalytic combustors, high-, standard-, and low-temperature SCR, and SCONO<sub>x</sub>. Successfully negotiated air permit that allowed facility to initially install DLN combustors and operate under a NO<sub>x</sub> plantwide “cap.” Within two major turbine overhauls, or approximately eight years, the NO<sub>x</sub> emissions per turbine must be at or below the equivalent of 5 ppm. The 5 ppm NO<sub>x</sub> target will be achieved through technological in-combustor NO<sub>x</sub> control such as catalytic combustion, or SCR or SCR equivalent end-of-pipe NO<sub>x</sub> control technologies if catalytic combustion is not available.

**Gas Turbines – Modification of RATA Procedures for Time-Share CEM.** Project manager and lead engineer for the development of alternate CO continuous emission monitor (CEM) Relative Accuracy Test Audit (RATA) procedures for time-share CEM system serving three 7.9 MW turbines located in San Diego. Close interaction with San Diego APCD and EPA Region 9 engineers was required to receive approval for the alternate CO RATA standard. The time-share CEM passed the subsequent annual RATA without problems as a result of changes to some of the CEM hardware and the more flexible CO RATA standard.

**Gas Turbines – Evaluation of NO<sub>x</sub> Control Technology Performance.** Lead engineer for performance review of dry low-NO<sub>x</sub> combustors, catalytic combustors, high-, standard-, and low-temperature selective catalytic reduction (SCR), and NO<sub>x</sub> absorption/conversion (SCONO<sub>x</sub>). Major turbine manufacturers and major manufacturers of end-of-pipe NO<sub>x</sub> control systems for gas turbines were contacted to determine current cost and performance of NO<sub>x</sub> control systems. A comparison of 1993 to 1999 “\$/kwh” and “\$/ton” cost of these control systems was developed in the evaluation.

**Gas Turbines – Evaluation of Proposed NO<sub>x</sub> Control System to Achieve 3 ppm Limit.** Lead engineer for evaluation for proposed combined cycle gas turbine NO<sub>x</sub> and CO control systems. Project was in litigation over contract terms, and there was concern that the GE Frame 7FA turbine could not meet the 3 ppm NO<sub>x</sub> permit limit using a conventional combustor with water injection followed by SCR. Operations personnel at GE Frame 7FA installations around the country were interviewed, along with principal SCR vendors, to corroborate that the installation could continuously meet the 3 ppm NO<sub>x</sub> limit.

**Gas Turbines – Title V "Presumptively Approvable" Compliance Assurance Monitoring Protocol.** Project manager and lead engineer for the development of a "presumptively approval" NO<sub>x</sub> parametric emissions monitoring system (PEMS) protocol for industrial gas turbines. "Presumptively approvable" means that any gas turbine operator selecting this monitoring protocol can presume it is acceptable to the U.S. EPA. Close interaction with the gas turbine manufacturer's design engineering staff and the U.S. EPA Emissions Measurement Branch (Research Triangle Park, NC) was required to determine modifications necessary to the current PEMS to upgrade it to "presumptively approvable" status.

**Environmental Due Diligence Review of Gas Turbine Sites – Mexico.** Task leader to prepare regulatory compliance due diligence review of Mexican requirements for gas turbine power plants. Project involves eleven potential sites across Mexico, three of which are under construction. Scope involves identification of all environmental, energy sales, land use, and transportation corridor requirements for power projects in Mexico.

Coordinator of Mexican environmental subcontractors gathering on-site information for each site, and translator of Spanish supporting documentation to English.

**Development of Air Emission Standards for Gas Turbines - Peru.** Served as principal technical consultant to the Peruvian Ministry of Energy in Mines (MEM) for the development of air emission standards for Peruvian gas turbine power plants. All major gas turbine power plants in Peru are currently using water injection to increase turbine power output. Recommended that 42 ppm on natural gas and 65 ppm on diesel (corrected to 15% O<sub>2</sub>) be established as the NO<sub>x</sub> limit for existing gas turbine power plants. These limits reflect NO<sub>x</sub> levels readily achievable using water injection at high load. Also recommended that new gas turbine sources be subject to a BACT review requirement.

**Gas Turbines – Title V Permit Templates.** Lead engineer for the development of standardized permit templates for approximately 100 gas turbines operated by the oil and gas industry in the San Joaquin Valley. Emissions limits and monitoring requirements were defined for units ranging from GE Frame 7 to Solar Saturn turbines. Stand-alone templates were developed based on turbine size and NO<sub>x</sub> control equipment. NO<sub>x</sub> utilized in the target turbine population ranged from water injection alone to water injection combined with SCR.

**Gas Turbines – Evaluation of NO<sub>x</sub>, SO<sub>2</sub> and PM Emission Profiles.** Performed a comparative evaluation of the NO<sub>x</sub>, SO<sub>2</sub> and particulate (PM) emission profiles of principal utility-scale gas turbines for an independent power producer evaluating project opportunities in Latin America. All gas turbine models in the 40 MW to 240 MW range manufactured by General Electric, Westinghouse, Siemens and ABB were included in the evaluation.

**Stationary Internal Combustion Engine (ICE) RACT/BARCT Evaluation.** Lead engineer for evaluation of retrofit NO<sub>x</sub> control options available for the oil and gas production industry gas-fired ICE population in the San Joaquin Valley affected by proposed Best Available Retrofit Control Technology (BARCT) emission limits. Evaluation centered on lean-burn compressor engines under 500 bhp, and rich-burn constant and cyclically loaded (rod pump) engines under 200 bhp. The results of the evaluation indicated that rich burn cyclically-loaded rod pump engines comprised 50 percent of the affected ICE population, though these ICEs accounted for only 5 percent of the uncontrolled gas-fired stationary ICE NO<sub>x</sub> emissions. Recommended retrofit NO<sub>x</sub> control strategies included: air/fuel ratio adjustment for rod pump ICEs, Non-selective catalytic reduction (NSCR) for rich-burn, constant load ICEs, and "low emission" combustion modifications for lean burn ICEs.

**Development of Air Emission Standards for Stationary ICEs - Peru.** Served as principal technical consultant to the Peruvian Ministry of Energy in Mines (MEM) for the development of air emission standards for Peruvian stationary ICE power plants. Draft 1997 World Bank NO<sub>x</sub> and particulate emission limits for stationary ICE power plants served as the basis for proposed MEM emission limits. A detailed review of ICE emissions data provided in PAMAs submitted to the MEM was performed to determine the level of effort that would be required by Peruvian industry to meet the proposed NO<sub>x</sub> and particulate emission limits. The draft 1997 WB emission limits were revised to reflect reasonably achievable NO<sub>x</sub> and particulate emission limits for ICEs currently in operation in Peru.

**Air Toxics Testing of Natural Gas-Fired ICEs.** Project manager for test plan/test program to measure volatile and semi-volatile organic air toxics compounds from fourteen gas-fired ICEs used in a variety of oil and gas production applications. Test data was utilized by oil and gas production facility owners throughout California to develop accurate ICE air toxics emission inventories.

**Ethanol Plant Dryer – Penn-Mar Ethanol, LLC.** Lead engineer on BACT evaluation for ethanol dryer. Dryer nitrogen oxide (NO<sub>x</sub>) emission limit of 30 ppm determined to be BACT following exhaustive review of existing and pending ethanol plant air permits and discussions with principal dryer vendors.

**BARCT Low NO<sub>x</sub> Burner Conversion – Industrial Boilers.** Lead engineer for a BARCT evaluation of low NO<sub>x</sub> burner options for natural gas-fired industrial boilers. Also evaluated methanol and propane as stand-by fuels to replace existing diesel stand-by fuel system and replacement of steam boilers with gas turbine co-generation system.

**BACT Packed Tower Scrubber/Mist Eliminator Performance Evaluations.** Project manager and lead engineer for Navy-wide plating shop air pollution control technology evaluation and emissions testing program. Mist eliminators and packed tower scrubbers controlling metal plating processes, which included hard chrome, nickel, copper, cadmium and precious metals plating, were extensively tested at three Navy plating shops. Chemical cleaning and stripping tanks, including hydrochloric acid, sulfuric acid, chromic acid and caustic, were also tested. The final product of this program was a military design specification for plating and chemical cleaning shop air pollution control systems. The hydrochloric acid mist sampling procedure developed during this program received a protected patent.

**BACT Packed Tower Scrubber/UV Oxidation System Pilot Test Program.** Technical advisor for pilot test program of packed tower scrubber/ultraviolet (UV) light VOC oxidation system controlling VOC emissions from microchip manufacturing facility in Los Angeles. The testing was sponsored in part by the SCAQMD's Innovative Technology Demonstration Program, to demonstrate this innovative control technology as BACT for microchip manufacturing operations. The target compounds were acetone, methylethylketone (MEK) and 1,1,1-trichloroethane, and compound concentrations ranged from 10-100 ppmv. The single stage packed tower scrubber consistently achieved greater than 90% removal efficiency on the target compounds. The residence time required in the UV oxidation system for effective oxidation of the target compounds proved significantly longer than the residence time predicted by the manufacturer.

**BACT Pilot Testing of Venturi Scrubber on Gas/Aerosol VOC Emission Source.** Technical advisor for project to evaluate venturi scrubber as BACT for mixed phase aerosol/gaseous hydrocarbon emissions from deep fat fryer. Venturi scrubber demonstrated high removal efficiency on aerosol, low efficiency on VOC emissions. A number of VOC tests indicated negative removal efficiency. This anomaly was traced to a high hydrocarbon concentration in the scrubber water. The pilot unit had been shipped directly to the jobsite from another test location by the manufacturer without any cleaning or inspection of the pilot unit.

**Pulp Mill Recovery Boiler BACT Evaluation.** Lead engineer for BACT analysis for control of SO<sub>2</sub>, NO<sub>x</sub>, CO, TNMHC, TRS and particulate emissions from the proposed addition of a new recovery furnace at a kraft pulp mill in Washington. A "top down" approach was used to evaluate potential control technologies for each of the pollutants considered in the evaluation.

**Air Pollution Control Equipment Design Specification Development.** Lead engineer for the development of detailed Navy design specifications for wet scrubbers and mist eliminators. Design specifications were based on field performance evaluations conducted at the Long Beach Naval Shipyard, Norfolk Naval Shipyard, and Jacksonville Naval Air Station. This work was performed for the U.S. Navy to provide generic design specifications to assist naval facility engineering divisions with air pollution control equipment selection. Also served as project engineer for the development of Navy design specifications for ESPs and fabric filters.

## **CONTINUOUS EMISSION MONITOR (CEM) PROJECT EXPERIENCE**

**Process Heater CO and NO<sub>x</sub> CEM Relative Accuracy Testing.** Project manager and lead engineer for process heater CO and NO<sub>x</sub> analyzer relative accuracy test program at petrochemical manufacturing facility. Objective of test program was to demonstrate that performance of onsite CO and NO<sub>x</sub> CEMs was in compliance with U.S. EPA "Boiler and Industrial Furnace" hazardous waste co-firing regulations. A TECO Model 48 CO analyzer and a TECO Model 10 NO<sub>x</sub> analyzer were utilized during the test program to provide  $\pm 1$  ppm measurement accuracy, and all test data was recorded by an automated data acquisition system. One of the two process heater CEM systems tested failed the initial test due to leaks in the gas conditioning system.

Troubleshooting was performed using O<sub>2</sub> analyzers, and the leaking component was identified and replaced. This CEM system met all CEM relative accuracy requirements during the subsequent retest.

**Performance Audit of NO<sub>x</sub> and SO<sub>2</sub> CEMs at Coal-Fired Power Plant.** Lead engineer on system audit and challenge gas performance audit of NO<sub>x</sub> and SO<sub>2</sub> CEMs at a coal-fired power plant in southern Nevada. Dynamic and instrument calibration checks were performed on the CEMs. A detailed visual inspection of the CEM system, from the gas sampling probes at the stack to the CEM sample gas outlet tubing in the CEM trailer, was also conducted. The CEMs passed the dynamic and instrument calibration requirements specified in EPA's Performance Specification Test - 2 (NO<sub>x</sub> and SO<sub>2</sub>) alternative relative accuracy requirements.

## **AIR ENGINEERING/AIR TESTING PROJECT EXPERIENCE – GENERAL**

**Reverse Air Fabric Filter Retrofit Evaluation – Coal-Fired Boiler.** Lead engineer for upgrade of reverse air fabric filters serving coal-fired industrial boilers. Fluorescent dye injected to pinpoint broken bags and damper leaks. Corrosion of pneumatic actuators serving reverse air valves and inadequate insulation identified as principal causes of degraded performance.

**Pulse-Jet Fabric Filter Performance Evaluation – Gold Mine.** Lead engineer on upgrade of pulse-jet fabric filter and associated exhaust ventilation system serving an ore-crushing facility at a gold mine. Fluorescent dye used to identify bag collar leaks, and modifications were made to pulse air cycle time and duration. This marginal source was in compliance at 20 percent of emission limit following completion of repair work.

**Pulse-Jet Fabric Filter Retrofit - Gypsum Calciner.** Lead engineer on upgrade of pulse-jet fabric filter controlling particulate emissions from a gypsum calciner. Recommendations included a modified bag clamping mechanism, modified hopper evacuation valve assembly, and changes to pulse air cycle time and pulse duration.

**Wet Scrubber Retrofit – Plating Shop.** Project engineer on retrofit evaluation of plating shop packed-bed wet scrubbers failing to meet performance guarantees during acceptance trials, due to excessive mist carryover. Recommendations included relocation of the mist eliminator (ME), substitution of the original chevron blade ME with a mesh pad ME, and use of higher density packing material to improve exhaust gas distribution. Wet scrubbers passed acceptance trials following completion of recommended modifications.

**Electrostatic Precipitator (ESP) Retrofit Evaluation – MSW Boiler.** Lead engineer for retrofit evaluation of single field ESP on a municipal solid waste (MSW) boiler. Recommendations included addition of automated power controller, inlet duct turning vanes, and improved collecting plate rapping system.

**ESP Electric Coil Rapper Vibration Analysis Testing - Coal-Fired Boiler.** Lead engineer for evaluation of ESP rapper effectiveness test program on three field ESP equipped with "magnetically induced gravity return" (MIGR) rappers. Accelerometers were placed in a grid pattern on ESP collecting plates to determine maximum instantaneous plate acceleration at a variety of rapper power setpoints. Testing showed that the rappers met performance specification requirements.

**Aluminum Remelt Furnace Particulate Emissions Testing.** Project manager and lead engineer for high temperature (1,600 °F) particulate sampling of a natural gas-fired remelt furnace at a major aluminum rolling mill. Objectives of test program were to: 1) determine if condensable particulate was present in stack gases, and 2) to validate the accuracy of the in-stack continuous opacity monitor (COM). Designed and constructed a customized high temperature (inconel) PM<sub>10</sub>/Mtd 17 sampling assembly for test program. An onsite natural gas-fired boiler was also tested to provide comparative data for the condensable particulate portion of the test program. Test results showed that no significant levels of condensable particulate in the remelt furnace exhaust gas, and indicated that the remelt furnace and boiler had similar particulate emission rates. Test results also showed that the COM was accurate.

**Aluminum Remelt Furnace CO and NO<sub>x</sub> Testing.** Project manager and lead engineer for continuous week-long testing of CO and NO<sub>x</sub> emissions from aluminum remelt furnace. Objective of test program was to



characterize CO and NO<sub>x</sub> emissions from representative remelt furnace for use in the facility's criteria pollution emissions inventory. A TECO Model 48 CO analyzer and a TECO Model 10 NO<sub>x</sub> analyzer were utilized during the test program to provide ±1 ppm measurement accuracy, and all test data was recorded by an automated data acquisition system.

## **OIL AND GAS PRODUCTION AIR ENGINEERING/TESTING EXPERIENCE**

**Air Toxics Testing of Oil and Gas Production Sources.** Project manager and lead engineer for test plan/test program to determine VOC removal efficiency of packed tower scrubber controlling sulfur dioxide emissions from a crude oil-fired steam generator. Ratfisch 55 VOC analyzers were used to measure the packed tower scrubber VOC removal efficiency. Tedlar bag samples were collected simultaneously to correlate BTX removal efficiency to VOC removal efficiency. This test was one of hundreds of air toxics tests performed during this test program for oil and gas production facilities from 1990 to 1992. The majority of the volatile air toxics analyses were performed at in-house laboratory. Project staff developed thorough familiarity with the applications and limitations of GC/MS, GC/PID, GC/FID, GC/ECD and GC/FPD. Tedlar bags, canisters, sorbent tubes and impingers were used during sampling, along with isokinetic tests methods for multiple metals and PAHs.

**Air Toxics Testing of Glycol Reboiler – Gas Processing Plant.** Project manager for test program to determine emissions of BTXE from glycol reboiler vent at gas processing facility handling 12 MM/cfd of produced gas. Developed innovative test methods to accurately quantify BTXE emissions in reboiler vent gas.

**Air Toxics Emissions Inventory Plan.** Lead engineer for the development of generic air toxics emission estimating techniques (EETs) for oil and gas production equipment. This project was performed for the Western States Petroleum Association in response to the requirements of the California Air Toxics "Hot Spots" Act. EETs were developed for all point and fugitive oil and gas production sources of air toxics, and the specific air toxics associated with each source were identified. A pooled source emission test methodology was also developed to moderate the cost of source testing required by the Act.

**Fugitive NMHC Emissions from TEOR Production Field.** Project manager for the quantification of fugitive Nonmethane hydrocarbon (NMHC) emissions from a thermally enhanced oil recovery (TEOR) oil production field in Kern County, CA. This program included direct measurement of NMHC concentrations in storage tank vapor headspace and the modification of available NMHC emission factors for NMHC-emitting devices in TEOR produced gas service, such as wellheads, vapor trunklines, heat exchangers, and compressors. Modification of the existing NMHC emission factors was necessary due to the high concentration of CO<sub>2</sub> and water vapor in TEOR produced gases.

**Fugitive Air Emissions Testing of Oil and Gas Production Fields.** Project manager for test plan/test program to determine VOC and air toxics emissions from oil storage tanks, wastewater storage tanks and produced gas lines. Test results were utilized to develop comprehensive air toxics emissions inventories for oil and gas production companies participating in the test program.

**Oil and Gas Production Field – Air Emissions Inventory and Air Modeling.** Project manager for oil and gas production field risk assessment. Project included review and revision of the existing air toxics emission inventory, air dispersion modeling, and calculation of the acute health risk, chronic non-carcinogenic risk and carcinogenic risk of facility operations. Results indicated that fugitive H<sub>2</sub>S emissions from facility operations posed a potential health risk at the facility fenceline.

## **PETROLEUM REFINERY AIR ENGINEERING/TESTING EXPERIENCE**

**Criteria and Air Toxic Pollutant Emissions Inventory for Proposed Refinery Modifications.** Project manager and technical lead for development of baseline and future refinery air emissions inventories for process modifications required to produce oxygenated gasoline and desulfurized diesel fuel at a California refinery. State of the art criteria and air toxic pollutant emissions inventories for refinery point, fugitive and

mobile sources were developed. Point source emissions estimates were generated using onsite criteria pollutant test data, onsite air toxics test data, and the latest air toxics emission factors from the statewide refinery air toxics inventory database. The fugitive volatile organic compound (VOC) emissions inventories were developed using the refinery's most recent inspection and maintenance (I&M) monitoring program test data to develop site-specific component VOC emission rates. These VOC emission rates were combined with speciated air toxics test results for the principal refinery process streams to produce fugitive VOC air toxics emission rates. The environmental impact report (EIR) that utilized this emission inventory data was the first refinery "Clean Fuels" EIR approved in California.

**Air Toxic Pollutant Emissions Inventory for Existing Refinery.** Project manager and technical lead for air toxic pollutant emissions inventory at major California refinery. Emission factors were developed for refinery heaters, boilers, flares, sulfur recovery units, coker deheading, IC engines, storage tanks, process fugitives, and catalyst regeneration units. Onsite source test results were utilized to characterize emissions from refinery combustion devices. Where representative source test results were not available, AP-42 VOC emission factors were combined with available VOC air toxics speciation profiles to estimate VOC air toxic emission rates. A risk assessment based on this emissions inventory indicated a relatively low health risk associated with refinery operations. Benzene, 1,3-butadiene and PAHs were the principal health risk related pollutants emitted.

**Air Toxics Testing of Refinery Combustion Sources.** Project manager for comprehensive air toxics testing program at a major California refinery. Metals, Cr<sup>+6</sup>, PAHs, H<sub>2</sub>S and speciated VOC emissions were measured from refinery combustion sources. High temperature Cr<sup>+6</sup> stack testing using the EPA Cr<sup>+6</sup> test method was performed for the first time in California during this test program. Representatives from the California Air Resources Board source test team performed simultaneous testing using ARB Method 425 (Cr<sup>+6</sup>) to compare the results of EPA and ARB Cr<sup>+6</sup> test methodologies. The ARB approved the test results generated using the high temperature EPA Cr<sup>+6</sup> test method.

**Air Toxics Testing of Refinery Fugitive Sources.** Project manager for test program to characterize air toxic fugitive VOC emissions from fifteen distinct process units at major California refinery. Gas, light liquid, and heavy liquid process streams were sampled. BTXE, 1,3-butadiene and propylene concentrations were quantified in gas samples, while BTXE, cresol and phenol concentrations were measured in liquid samples. Test results were combined with AP-42 fugitive VOC emission factors for valves, fittings, compressors, pumps and PRVs to calculate fugitive air toxics VOC emission rates.

## **LATIN AMERICA ENVIRONMENTAL PROJECT EXPERIENCE**

**Preliminary Design of Ambient Air Quality Monitoring Network – Lima, Peru.** Project leader for project to prepare specifications for a fourteen station ambient air quality monitoring network for the municipality of Lima, Peru. Network includes four complete gaseous pollutant, particulate, and meteorological parameter monitoring stations, as well as eight PM<sub>10</sub> and TSP monitoring stations.

**Evaluation of Proposed Ambient Air Quality Network Modernization Project – Venezuela.** Analyzed a plan to modernize and expand the ambient air monitoring network in Venezuela. Project was performed for the U.S. Trade and Development Agency. Direct interaction with policy makers at the Ministerio del Ambiente y de los Recursos Naturales Renovables (MARNR) in Caracas was a major component of this project.

**Evaluation of U.S.-Mexico Border Region Copper Smelter Compliance with Treaty Obligations – Mexico.** Project manager and lead engineer to evaluate compliance of U.S. and Mexican border region copper smelters with the SO<sub>2</sub> monitoring, recordkeeping and reporting requirements in Annex IV [Copper Smelters] of the La Paz Environmental Treaty. Identified potential problems with current ambient and stack monitoring practices that could result in underestimating the impact of SO<sub>2</sub> emissions from some of these copper smelters. Identified additional source types, including hazardous waste incinerators and power plants, that should be considered for inclusion in the La Paz Treaty process.

**Development of Air Emission Standards for Petroleum Refinery Equipment - Peru.** Served as principal technical consultant to the Peruvian Ministry of Energy in Mines (MEM) for the development of air emission standards for Peruvian petroleum refineries. The sources included in the scope of this project included: 1) SO<sub>2</sub> and NO<sub>x</sub> refinery heaters and boilers, 2) desulfurization of crude oil, particulate and SO<sub>2</sub> controls for fluid catalytic cracking units (FCCU), 3) VOC and CO emissions from flares, 4) vapor recovery systems for marine unloading, truck loading, and crude oil/refined products storage tanks, and 5) VOC emissions from process fugitive sources such as pressure relief valves, pumps, compressors and flanges. Proposed emission limits were developed for new and existing refineries based on a thorough evaluation of the available air emission control technologies for the affected refinery sources. Leading vendors of refinery control technology, such as John Zink and Exxon Research, provided estimates of retrofit costs for the largest Peruvian refinery, La Pampilla, located in Lima. Meetings were held in Lima with refinery operators and MEM staff to discuss the proposed emission limits and incorporate mutually agreed upon revisions to the proposed limits for existing Peruvian refineries.

**Development of Air Emission Limits for ICE Cogeneration Plant - Panamá.** Lead engineer assisting U.S. cogeneration plant developer to permit an ICE cogeneration plant at a hotel/casino complex in Panama. Recommended the use of modified draft World Bank NO<sub>x</sub> and PM limits for ICE power plants. The modification consisted of adding a thermal efficiency factor adjustment to the draft World Bank NO<sub>x</sub> and PM limits. These proposed ICE emission limits are currently being reviewed by Panamanian environmental authorities.

**Mercury Emissions Inventory for Stationary Sources in Northern Mexico.** Project manager and lead engineer to estimate mercury emissions from stationary sources in Northern Mexico. Major potential sources of mercury emissions include solid- and liquid-fueled power plants, cement kilns co-firing hazardous waste, and non-ferrous metal smelters. Emission estimates were provided for approximately eighty of these sources located in Northern Mexico. Coordinated efforts of two Mexican subcontractors, located in Mexico City and Hermosillo, to obtain process throughput data for each source included in the inventory.

**Translation of U.S. EPA Scrap Tire Combustion Emissions Estimation Document – Mexico.** Evaluated the Translated a U.S. EPA scrap tire combustion emissions estimation document from English to Spanish for use by Latin American environmental professionals.

**Environmental Audit of Aluminum Production Facilities – Venezuela.** Evaluated the capabilities of existing air, wastewater and solid/hazardous waste control systems used by the aluminum industry in eastern Venezuela. This industry will be privatized in the near future. Estimated the cost to bring these control systems into compliance with air, wastewater and solid/hazardous waste standards recently promulgated in Venezuela. Also served as technical translator for team of U.S. environmental engineers involved in the due diligence assessment.

**Assessment of Environmental Improvement Projects – Chile and Peru.** Evaluated potential air, water, soil remediation and waste recycling projects in Lima, Peru and Santiago, Chile for feasibility study funding by the U.S. Trade and Development Agency. Project required onsite interaction with in-country decisionmakers (in Spanish). Projects recommended for feasibility study funding included: 1) an air quality technical support project for the Santiago, Chile region, and 2) soil remediation/metals recovery projects at two copper mine/smelter sites in Peru.

**Air Pollution Control Training Course – Mexico.** Conducted two-day Spanish language air quality training course for environmental managers of assembly plants in Mexicali, Mexico. Spanish-language course manual prepared by Powers Engineering. Practical laboratory included training in use of combustion gas analyzer, flame ionization detector (FID), photoionization detector (PID), and occupational sampling.

**Renewable Energy Resource Assessment Proposal – Panama.** Translated and managed winning bid to evaluate wind energy potential in Panama. Direct interaction with the director of development at the national utility monopoly (IRHE) was a key component of this project.

**Comprehensive Air Emissions Testing at Assembly Plant – Mexico.** Project manager and field supervisor of emissions testing for particulates, NO<sub>x</sub>, SO<sub>2</sub> and CO at turbocharger/air cooler assembly plant in Mexicali, Mexico. Source specific emission rates were developed for each point source at the facility during the test program. Translated test report into Spanish for review by the Mexican federal environmental agency (SEMARNAP).

**Air Pollution Control Equipment Retrofit Evaluation – Mexico.** Project manager and lead engineer for comprehensive evaluation of air pollution control equipment and industrial ventilation systems in use at assembly plant consisting of four major facilities. Equipment evaluated included fabric filters controlling blast booth emissions, electrostatic precipitator controlling welding fumes, and industrial ventilation systems controlling welding fumes, chemical cleaning tank emissions, and hot combustion gas emissions. Recommendations included modifications to fabric filter cleaning cycle, preventative maintenance program for the electrostatic precipitator, and redesign of the industrial ventilation system exhaust hoods to improve capture efficiency.

**Comprehensive Air Emissions Testing at Assembly Plant – Mexico.** Project manager and field supervisor of emissions testing for particulates, NO<sub>x</sub>, SO<sub>2</sub> and CO at automotive components assembly plant in Acuña, Mexico. Source-specific emission rates were developed for each point source at the facility during the test program. Translated test report into Spanish.

**Fluent in Spanish.** Studied at the Universidad de Michoacán in Morelia, Mexico, 1993, and at the Colegio de España in Salamanca, Spain, 1987-88. Have lectured (in Spanish) on air monitoring and control equipment at the Instituto Tecnológico de Tijuana. Maintain contact with Comisión Federal de Electricidad engineers responsible for operation of wind and geothermal power plants in Mexico, and am comfortable operating in the Mexican business environment.

## PUBLICATIONS

Bill Powers, “*San Diego Smart Energy 2020 – The 21<sup>st</sup> Century Alternative*,” San Diego, October 2007.

Bill Powers, “*Energy, the Environment, and the California – Baja California Border Region*,” Electricity Journal, Vol. 18, Issue 6, July 2005, pp. 77-84.

W.E. Powers, “*Peak and Annual Average Energy Efficiency Penalty of Optimized Air-Cooled Condenser on 515 MW Fossil Fuel-Fired Utility Boiler*,” presented at California Energy Commission/Electric Power Research Institute Advanced Cooling Technologies Symposium, Sacramento, California, June 2005.

W.E. Powers, R. Wydrum, P. Morris, “*Design and Performance of Optimized Air-Cooled Condenser at Crockett Cogeneration Plant*,” presented at EPA Symposium on Technologies for Protecting Aquatic Organisms from Cooling Water Intake Structures, Washington, DC, May 2003.

P. Pai, D. Niemi, W.E. Powers, “*A North American Anthropogenic Inventory of Mercury Emissions*,” to be presented at Air & Waste Management Association Annual Conference in Salt Lake City, UT, June 2000.

P.J. Blau and W.E. Powers, “*Control of Hazardous Air Emissions from Secondary Aluminum Casting Furnace Operations Through a Combination of: Upstream Pollution Prevention Measures, Process Modifications and End-of-Pipe Controls*,” presented at 1997 AWMA/EPA Emerging Solutions to VOC & Air Toxics Control Conference, San Diego, CA, February 1997.

W.E. Powers, et. al., "*Hazardous Air Pollutant Emission Inventory for Stationary Sources in Nogales, Sonora, Mexico*," presented at 1995 AWMA/EPA Emissions Inventory Specialty Conference, RTP, NC, October 1995.

W.E. Powers, "*Develop of a Parametric Emissions Monitoring System to Predict NO<sub>x</sub> Emissions from Industrial Gas Turbines*," presented at 1995 AWMA Golden West Chapter Air Pollution Control Specialty Conference, Ventura, California, March 1995.

W. E. Powers, et. al., "*Retrofit Control Options for Particulate Emissions from Magnesium Sulfite Recovery Boilers*," presented at 1992 TAPPI Envr. Conference, April 1992. Published in *TAPPI Journal*, July 1992.

S. S. Parmar, M. Short, W. E. Powers, "*Determination of Total Gaseous Hydrocarbon Emissions from an Aluminum Rolling Mill Using Methods 25, 25A, and an Oxidation Technique*," presented at U.S. EPA Measurement of Toxic and Related Air Pollutants Conference, May 1992.

N. Meeks, W. E. Powers, "*Air Toxics Emissions from Gas-Fired Internal Combustion Engines*," presented at AIChE Summer Meeting, August 1990.

W. E. Powers, "*Air Pollution Control of Plating Shop Processes*," presented at 7th AES/EPA Conference on Pollution Control in the Electroplating Industry, January 1986. Published in *Plating and Surface Finishing* magazine, July 1986.

H. M. Davenport, W. E. Powers, "*Affect of Low Cost Modifications on the Performance of an Undersized Electrostatic Precipitator*," presented at 79th Air Pollution Control Association Conference, June 1986.

## **AWARDS**

Engineer of the Year, 1991 – ENSR Consulting and Engineering, Camarillo

Engineer of the Year, 1986 – Naval Energy and Environmental Support Activity, Port Hueneme

Productivity Excellence Award, 1985 – U. S. Department of Defense

## **PATENTS**

Sedimentation Chamber for Sizing Acid Mist, Navy Case Number 70094