

## **NO<sub>x</sub> Control for Utility Boiler Ozone Transport Rule Compliance**

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### **ABSTRACT**

With sponsorship from the USDOE National Energy Technology Laboratory's Innovations for Existing Plants Program, The Babcock & Wilcox Company (B&W) and Fuel Tech, Inc. (Fuel Tech) teamed to evaluate an integrated solution for NO<sub>x</sub> control. This system was comprised of B&W's DRB-4Z<sup>®</sup> low-NO<sub>x</sub> pulverized coal (PC) burner technology and Fuel Tech's NO<sub>x</sub>OUT<sup>®</sup>, a selective non-catalytic reduction (SNCR) technology, capable of meeting a target emission limit of 0.15 lb NO<sub>x</sub>/10<sup>6</sup> Btu with ammonia slip of less than 5 ppm. Commercial installations of B&W's low-NO<sub>x</sub> burner, in combination with overfire air ports using PRB coal, have demonstrated a NO<sub>x</sub> level of 0.15 to 0.2 lb/10<sup>6</sup> Btu under staged combustion conditions. The proposed goal of the combustion system (no SNCR) for this project was a NO<sub>x</sub> level at 0.15 lb/10<sup>6</sup> Btu. The NO<sub>x</sub> reduction goal for SNCR was 25% below the low-NO<sub>x</sub> combustion emission levels. Therefore, overall NO<sub>x</sub> emissions would approach a level of 0.11 lb/10<sup>6</sup> Btu.

Promising results were obtained with this technology from large-scale testing in B&W's 100-million Btu/hr Clean Environment Development Facility (CEDF) which simulates the conditions of large coal-fired utility boilers. NO<sub>x</sub> emissions were reduced with urea injection at full load via a convective pass multiple nozzle lance (MNL) in front of the superheater tubes or in the convective tube bank. The goals of the program were met. At 100% load, using the MNL for very low baseline NO<sub>x</sub> (0.094 to 0.162 lb/10<sup>6</sup> Btu depending on burner stoichiometry), an approximately 25% NO<sub>x</sub> reduction was achieved (0.071 to 0.124 lb/10<sup>6</sup> Btu) while maintaining NH<sub>3</sub> slip less than 6.4 ppm. At 60% load, using MNL or only wall-injectors for very low baseline NO<sub>x</sub> levels, more than 30% NO<sub>x</sub> reduction was achieved.

## **1 INTRODUCTION**

The Babcock & Wilcox Company (B&W) and Fuel Tech, Inc. (Fuel Tech), through sponsorship of the U.S. Department of Energy (DOE), teamed together to further investigate an integrated solution for nitrogen oxides (NO<sub>x</sub>) control. This system was comprised of B&W's DRB-4Z<sup>®</sup> low-NO<sub>x</sub> pulverized coal (PC) burner and Fuel Tech's NO<sub>x</sub>OUT<sup>®</sup> SNCR (selective non-catalytic reduction) technology. The program built on previous testing that utilized wall injectors for NO<sub>x</sub> control. During the previous test program, positive results were obtained, achieving low NO<sub>x</sub> with the DRB-4Z<sup>®</sup> burner (without air staging) and achieving significant further NO<sub>x</sub> reduction with Fuel Tech's SNCR technology while controlling the ammonia slip to less than 5 ppm. However, the overall NO<sub>x</sub> emissions fell short of the previous project goal. During the previous testing, limited cases were performed with a multiple nozzle lance that was installed into the convective pass. Although conditions were not optimized, promising results were obtained. Building on this data, B&W and Fuel Tech believed that improved performance could be obtained with convective pass injection at full load via a convective pass multiple nozzle lance (MNL) in front of the superheater tubes. The technology has the following advantages: 1) lower injection temperature; 2) improved mixing between urea and boiler gases; and 3) achievement of very fine urea particles that evaporate quickly and engage in reducing NO<sub>x</sub>. Therefore, a new program was developed that evaluated the full potential of NO<sub>x</sub> reduction utilizing the convective pass MNL with the DRB-4Z<sup>®</sup> low-NO<sub>x</sub> burner.

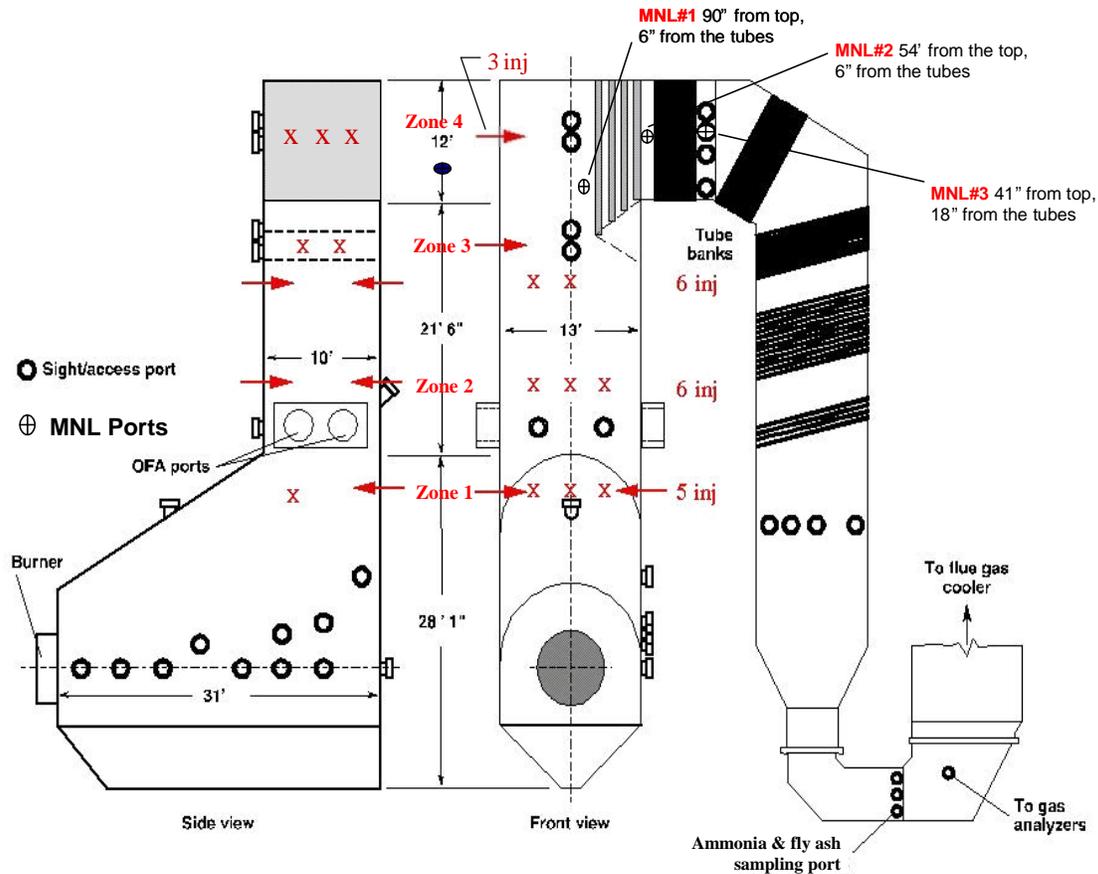
## **2 OBJECTIVE**

The objective of the program was to achieve a NO<sub>x</sub> level below 0.15 lb/10<sup>6</sup> Btu (with ammonia slip of less than 5 ppm) in the CEDF using Powder River Basin (PRB) coal and B&W's DRB-4Z<sup>®</sup> low-NO<sub>x</sub> pulverized coal (PC) burner in combination with dual zone overfire air ports and Fuel Tech's NO<sub>x</sub>OUT<sup>®</sup> System. Commercial installations of B&W's low-NO<sub>x</sub> burner in combination with overfire air ports using PRB coal have demonstrated a NO<sub>x</sub> level of 0.15 to 0.2 lb/10<sup>6</sup> Btu under staged combustion conditions. The proposed goal of the combustion system (no SNCR) for this project was a NO<sub>x</sub> level at 0.15 lb/10<sup>6</sup> Btu. The NO<sub>x</sub> reduction goal for SNCR was 25% from the low-NO<sub>x</sub> combustion emission levels. Therefore, overall NO<sub>x</sub> emissions would approach a level of 0.11 lb/10<sup>6</sup> Btu in commercial installation.

## **3 RESEARCH FACILITY**

Large-scale testing was performed in B&W's 100 million Btu/hr Clean Environment Development Facility (CEDF), which simulates the conditions of large scale coal-fired utility boilers. This one-of-a-kind facility is equipped with one near full-scale B&W DRB-4Z<sup>®</sup> burner. The CEDF was constructed with water walls and insulated with refractory to simulate the thermal conditions of the middle row burner in a commercial boiler. The CEDF has also been equipped with dual-zone overfire air ports. These ports were strategically located to allow for introduction of combustion air for carbon burnout and further NO<sub>x</sub> reduction without interfering with the gas flow patterns in the burner tunnel of the furnace. The convective pass was designed to simulate the flue gas time-temperature pattern found in commercial boilers. In the SNCR process, the products of

combustion are treated with an aqueous urea solution, which combines in reduction reactions with  $\text{NO}_x$  to yield molecular nitrogen. The convective pass was equipped with three new ports for the SNCR multiple nozzle lance. The gas temperature at these three locations ranged from 2000 to 1650°F, providing a large temperature window for optimizing the SNCR reactions. Figure 1 shows the injection system and furnace schematic.



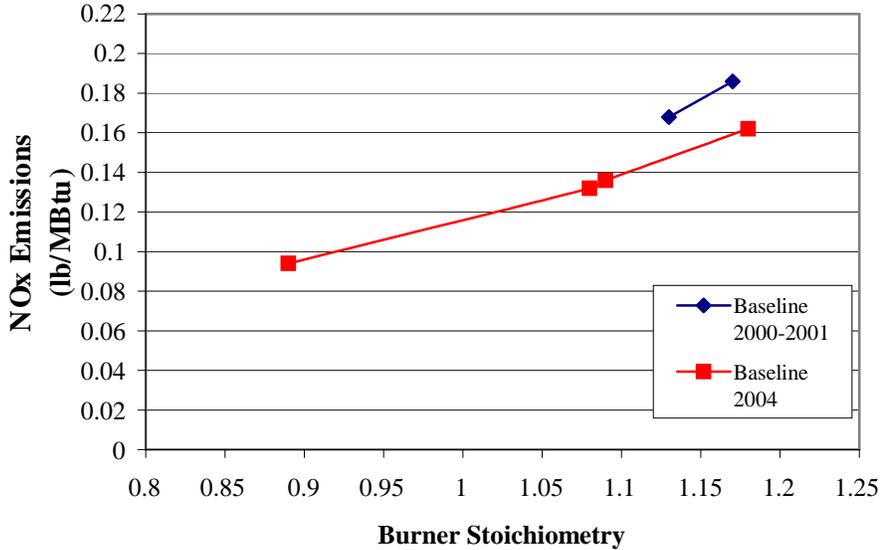
**FIGURE 1 CEDF SCHEMATIC WITH SNCR INJECTION LOCATIONS**

#### **4 EXPERIMENTAL RESULTS**

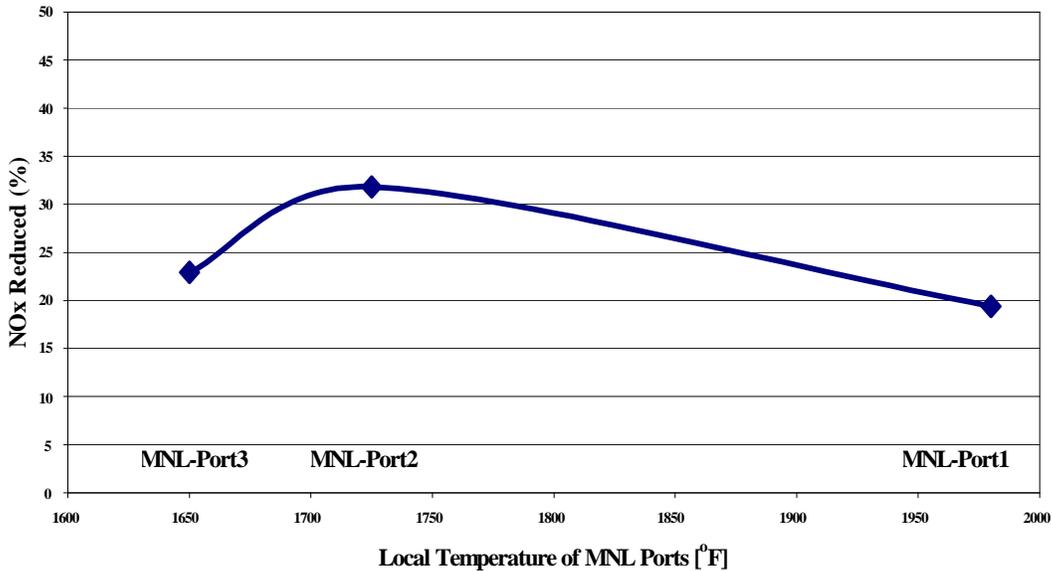
Low  $\text{NO}_x$  emissions were achieved during CEDF testing. While firing a Black Thunder PRB coal, baseline  $\text{NO}_x$  values at full load conditions were found to range from 0.09 to 0.16  $\text{lb}/10^6$  Btu depending on burner stoichiometry. The baseline  $\text{NO}_x$  values from this round of testing were found to be slightly lower than the previous SNCR test campaign and more comparable to typical values seen during other CEDF test programs and field results. A comparison of the baseline values is shown in Figure 2.

As shown in Figure 1, three MNL ports were utilized during testing. The effect of temperature on the SNCR chemistry was demonstrated during testing by varying the injection location between the ports and measuring the gas temperature in those locations. Figure 3 shows that the MNL-Port 2 was determined to be optimum location at the full load conditions of the CEDF. Temperatures near MNL-Port 1 were found to be higher

than desired, which caused the oxidation reaction of urea to  $\text{NO}_x$  to become a significant path and compete with  $\text{NO}_x$  reductions for the reagent. The MNL-Port 3, however, was to be on the edge of the lower limit of the effective temperature window. At the lower temperature, the oxidation reaction of urea requires a longer reaction time and therefore reductions are not as great and ammonia slip can become high.



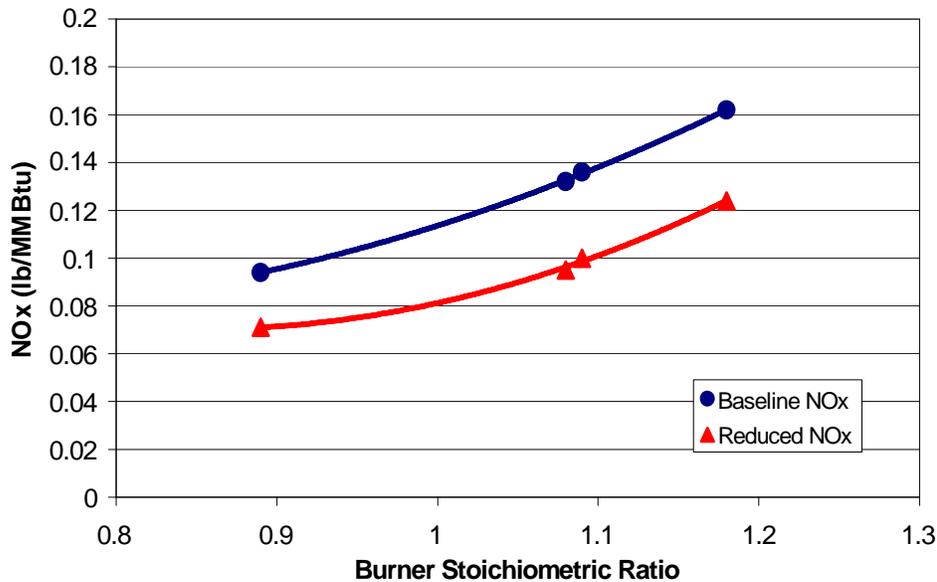
**FIGURE 2 COMPARISON OF BASELINE  $\text{NO}_x$  VALUES FROM PREVIOUS SNCR TEST PROGRAM TO CURRENT SNCR TEST PROGRAM IN THE CEDF**



**FIGURE 3 TEMPERATURE EFFECT ON  $\text{NO}_x$  REDUCTION FOR MNL PORT LOCATIONS FOR THE CEDF AT FULL LOAD CONDITIONS**

$\text{NO}_x$  values representing an approximately 25% reduction were achieved when the MNL was utilized for urea injection in the convective pass. These reduced  $\text{NO}_x$  values ranged

from 0.071 to 0.124 lb/10<sup>6</sup> Btu, while maintaining NH<sub>3</sub> slip less than 6.4 ppm. Figure 4 shows these results. The MNL-Port 2 location shows good urea utilization due to good chemical coverage and the right temperatures.



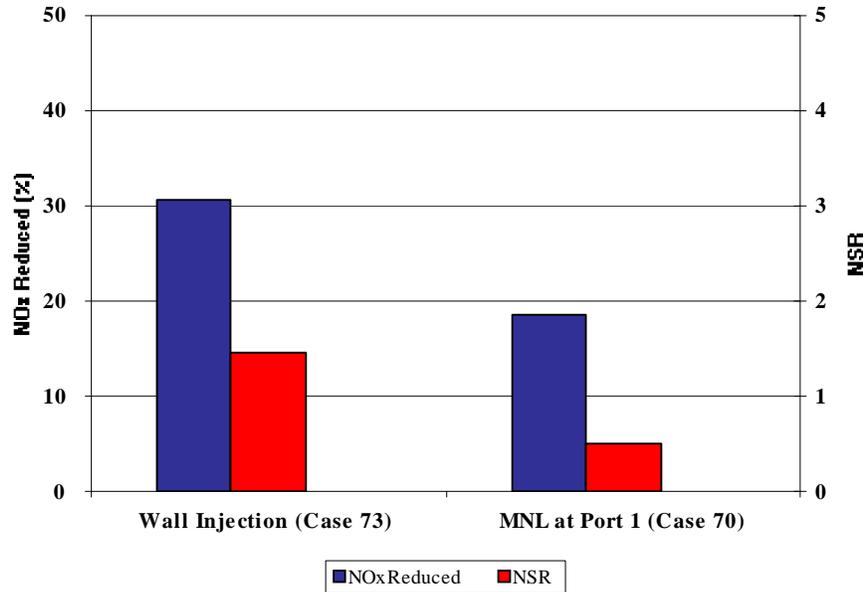
**FIGURE 4 NO<sub>x</sub> REDUCTION WITH UREA INJECTION AT FULL LOAD CONDITIONS IN THE CEDF**

For reduced operation at 60% load, using the MNL ports proved to be not as effective as utilizing wall-injectors only. Figure 5 shows a comparison of wall-injection versus MNL injection at 60% load operation. Wall-injection alone was able to achieve a 31% reduction in NO<sub>x</sub> levels compared to only an 18% NO<sub>x</sub> reduction when utilizing only the MNL at Port 1.

## 5 MODELING

Fuel Tech's proprietary Chemical Kinetics Model (CKM) results were used to predict the performance of the NO<sub>x</sub>OUT<sup>®</sup> process and identify the optimum temperature ranges in which chemicals should be released. Temperature-residence time data were computed from the CFD streamlines as input to the chemical kinetics model. A number of streamlines were generated for each of the cases. The streamlines follow the modeled furnace flow beginning at an elevation in the lower furnace. A representative sample of the streamlines was selected and considered to sufficiently describe the temperature distribution within the boiler. CKM modeling was performed on these representative profiles for each of the three cases.

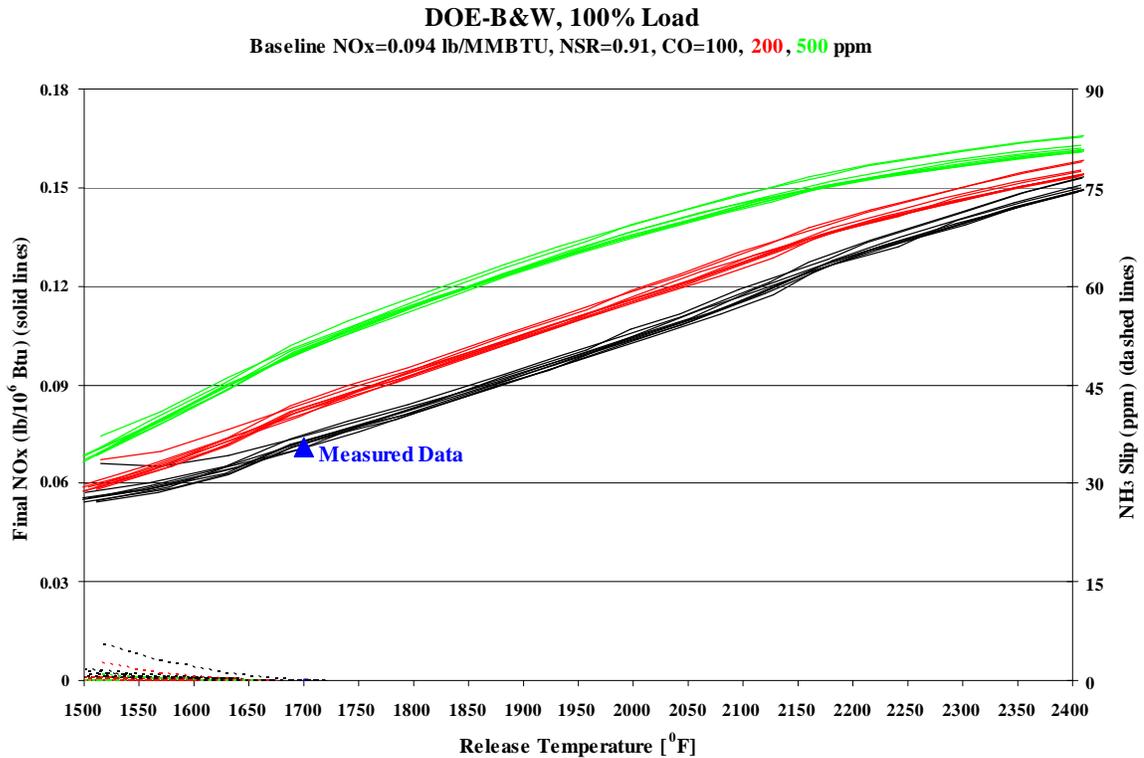
Achievable NO<sub>x</sub> reduction is typically limited at low temperatures by ammonia slip and at high temperatures by a lack of significant NO<sub>x</sub> reduction. The identification of temperature limits for desired NO<sub>x</sub> control is an important result of CKM analysis.



**FIGURE 5 COMPARISON OF WALL-INJECTORS AND MNL AT PORT 1 FOR 60% LOAD OPERATION AT THE CEDF**

Based on the measured data during the testing, at 100% load, the chemical release temperature from the MNL at Port 2 was about 1700°F, and local CO concentration was less than 100 ppm. The testing data showed that the NO<sub>x</sub> concentrations were reduced from 0.094 lb/10<sup>6</sup> Btu to 0.071 lb/10<sup>6</sup> Btu at a nitrogen stoichiometry ratio (NSR) of 0.91, and from 0.132 lb/10<sup>6</sup> Btu to 0.095 lb/10<sup>6</sup> Btu at an NSR of 2.43, and from 0.162 lb/10<sup>6</sup> Btu to 0.124 lb/10<sup>6</sup> Btu at an NSR of 0.58. Using the MNL at Port 2, the chemical coverage of the flue gas was excellent. At 60% load, from the wall injection in Zone 3 and Zone 4, chemical reaction occurred near the furnace exit, where based on the previous testing data, the temperature was about 1700°F and CO concentration was less than 100 ppm. The chemical coverage was good but may miss some coverage of the flue gases. The testing data showed the NO<sub>x</sub> concentration was reduced from 0.133 lb/10<sup>6</sup> Btu to 0.081 lb/10<sup>6</sup> Btu.

Figure 6 is a plot of the results of CKM analysis at 100% load across varied initial chemical release temperatures for an assumed baseline NO<sub>x</sub> concentration of 0.094 lb/10<sup>6</sup> Btu. The figure indicates the results of furnace injection at an NSR of 0.91, with initial CO concentrations of 100 ppm, 200 ppm and 500 ppm. At 100 ppm CO, the effective chemical release temperature window for NO<sub>x</sub> reduction is between 1600°F and 1900°F. At 100 ppm CO and 1700°F matching the combustion conditions at MNL- Port 2, the CKM results show that final NO<sub>x</sub> concentration of 0.072 lb/10<sup>6</sup> Btu is achievable, which matches the measured data (i.e., 0.071 lb/10<sup>6</sup> Btu as marked in the figure) very well. The CKM results indicated that better NO<sub>x</sub> reduction can be achieved if the chemical release temperature is lower. However, in practice, large droplets may not be able to evaporate completely at a lower temperature, which leads to ammonia slip.



**FIGURE 6 CKM RESULTS FOR 100% LOAD AND BASELINE NO<sub>x</sub>=0.094 LB/10<sup>6</sup> BTU**

Figure 7 shows the comparison of experimental data with modeling results with different baseline NO<sub>x</sub> levels. As discussed above, final NO<sub>x</sub> levels measured for all three cases match modeling predictions very well.

Figure 8 shows the CKM results at 60% load. At 1.50 NSR, 100 ppm CO and 1700°F, NO<sub>x</sub> reduction from 0.133 to 0.065 lb/10<sup>6</sup> Btu is predicted, compared to the measured data from 0.133 to 0.081 lb/10<sup>6</sup> Btu. Incomplete chemical coverage of the gases may cause the difference between the prediction and experiment when only wall injection was used. At this load, chemical release temperatures from the MNL at Port 1 were within the effective temperature window, but the gases at the top of the furnace exit were not treated effectively. This explained why NO<sub>x</sub> reduction using MNL could not exceed the performance using wall injection only.

From the discussion above, it was found that the CKM modeling could accurately predict experimental data. With the aid of CKM and CFD modeling, the injection design for this unit, including the MNL, provided very good chemical coverage and releases chemical reagent within effective temperature windows. At low initial NO<sub>x</sub> concentrations, 20-30% reductions were achievable, while maintaining control of NH<sub>3</sub> slip.

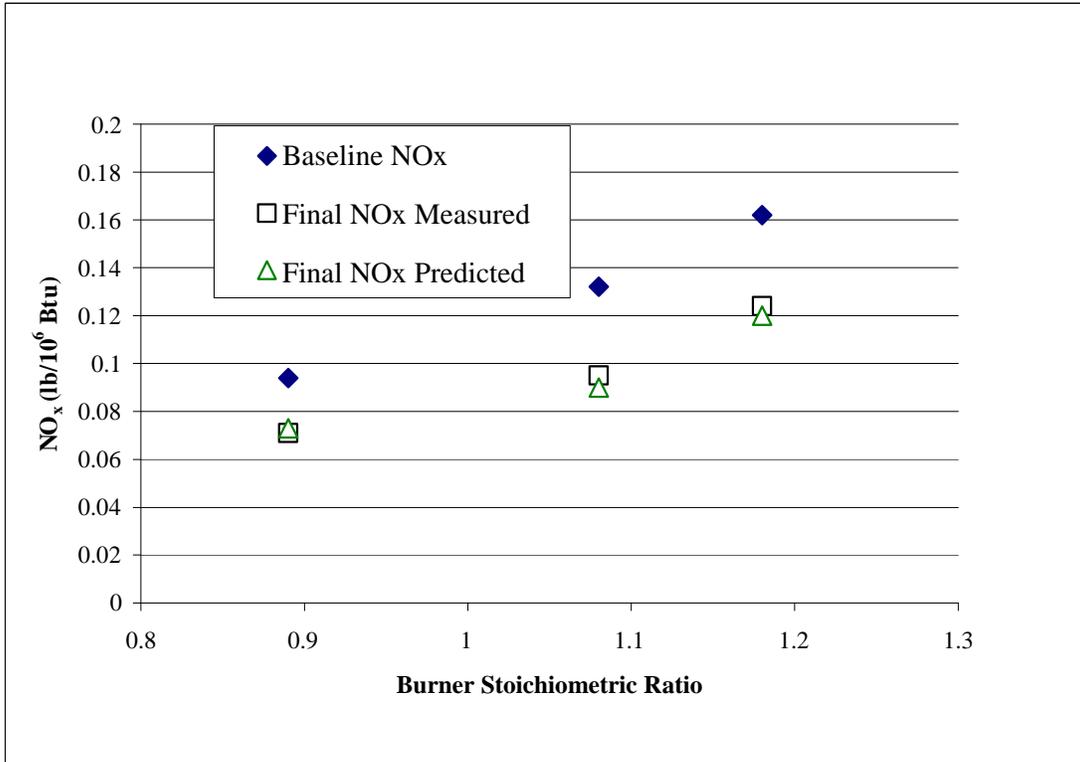


FIGURE 7 COMPARISON OF EXPERIMENTAL DATA WITH MODELING PREDICTIONS

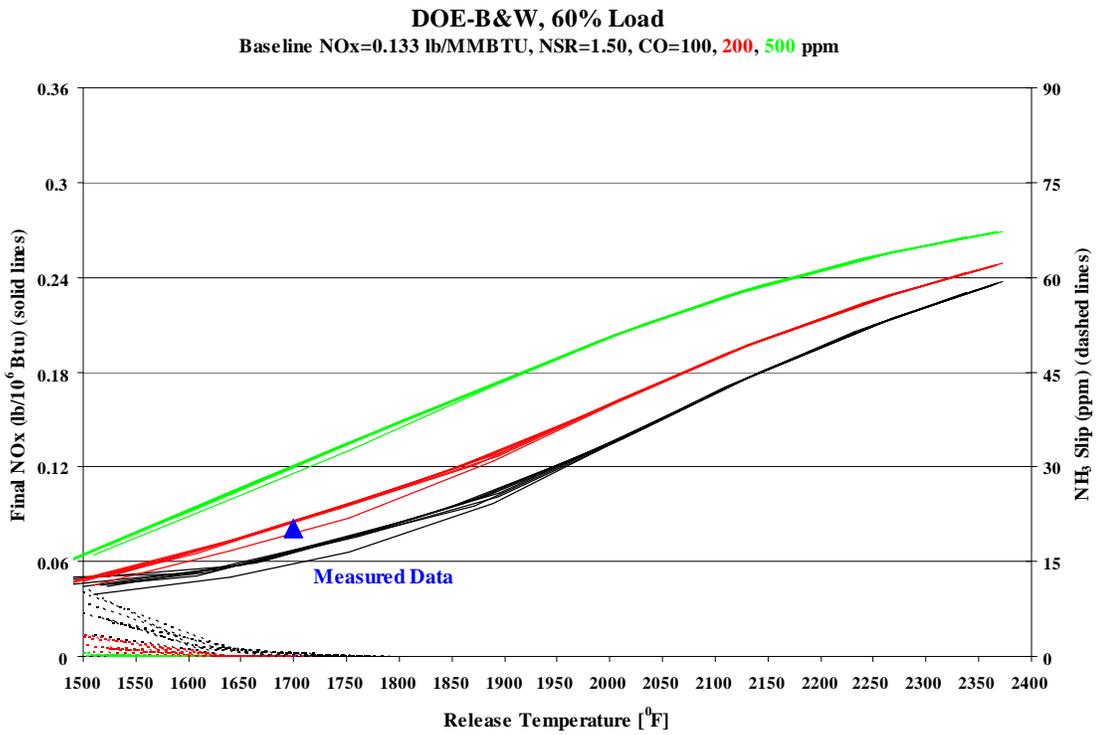


FIGURE 8 CKM RESULTS FOR 60% LOAD AND BASELINE NO<sub>x</sub>=0.133 LB/10<sup>6</sup> BTU

## 6 ECONOMICS

Economic evaluation of integrating the individually demonstrated low NO<sub>x</sub> burner (LNB) with overfire air ports (OFA) and selective non-catalytic reduction (SNCR) systems was compared to commercially available selective catalytic reduction (SCR) for a 500 MWe wall-fired, coal-burning boiler for achieving the 0.15 lb NO<sub>x</sub>/10<sup>6</sup>Btu. Since DRB-4Z<sup>®</sup> burner NO<sub>x</sub> emission is affected by coal rank, different options were considered for boilers using PRB, high volatile bituminous coal, and medium volatile coal.

For units using PRB, the options are:

- 1) LNB with OFA when the DRB-4Z<sup>®</sup> burner with OFA ports NO<sub>x</sub> emission level is 0.15 lb NO<sub>x</sub>/10<sup>6</sup> Btu,
- 2) LNB with OFA plus NO<sub>x</sub>OUT<sup>®</sup> when the DRB-4Z<sup>®</sup> burner with OFA ports NO<sub>x</sub> emission level is 0.2 lb NO<sub>x</sub>/10<sup>6</sup> Btu,
- 3) LNB with OFA and purchasing NO<sub>x</sub> credit when the DRB-4Z<sup>®</sup> burner with OFA ports NO<sub>x</sub> emission level is 0.2 lb NO<sub>x</sub>/10<sup>6</sup> Btu,
- 4) NO<sub>x</sub>OUT CASCADE<sup>®</sup>, or
- 5) SCR-only systems with a 90% removal efficiency enabling the utility to sell extra credits.

For units burning high volatile bituminous coal, NO<sub>x</sub> achieved with the DRB-4Z<sup>®</sup> burner is approximately 0.3 lb/10<sup>6</sup> Btu. The control options are:

- 1) LNB+OFA+SNCR and purchasing NO<sub>x</sub> credit for compliance,
- 2) Use LNB+OFA+CASCADE, or

For units burning medium volatile matter coal, NO<sub>x</sub> achieved with the DRB-4Z<sup>®</sup> burner was estimated at 0.4 lb NO<sub>x</sub>/10<sup>6</sup> Btu. The control option is LNB+OFA+ Cascade.

Fuel Tech investigated the NO<sub>x</sub>OUT CASCADE<sup>®</sup> for cases with high reagent injection rates (burner NO<sub>x</sub> ≥ 0.3 lb/10<sup>6</sup> Btu) where ammonia slip can be reduced with a catalyst. There was no catalyst available in the CEDF to promote reaction between ammonia and NO<sub>x</sub> which is the basis for NO<sub>x</sub>OUT CASCADE<sup>®</sup> technology. For the purpose of this economic analysis, the NO<sub>x</sub>OUT CASCADE<sup>®</sup> NO<sub>x</sub> reduction was estimated based on Fuel Tech's experience. The capital cost of NO<sub>x</sub>OUT CASCADE<sup>®</sup> is lower because it is assumed that the NO<sub>x</sub>OUT CASCADE<sup>®</sup> will be an in-duct system and therefore cost saving over a standard SCR system can be realized.

Table 1 compares the annual levelized costs of NO<sub>x</sub> control for different options. The costs are based on 2004 dollars for a 500 MWe boiler with a pre-retrofit NO<sub>x</sub> level of 0.5 lb/10<sup>6</sup>Btu. A 20 year project life and 20 year book life were selected. The most important assumption was the NO<sub>x</sub> credit cost determined from the market trading on SIP NO<sub>x</sub> credits. The current price for NO<sub>x</sub> credit is approximately \$2,500 per ton. However, the publicly available data showed the cost of NO<sub>x</sub> credits varies from \$7,900 to \$4,300 per ton for the August 2001 through May 2003 period. Therefore, we performed a sensitivity study of this value to determine at what price an option is viable (see below). An SCR efficiency of 90%, which is available commercially, was considered.

The leveled costs are illustrated as a range, since these costs can be different in different boilers. The SCR capital cost is a strong function of retrofit difficulties such as availability of space for the SCR reactor, and the need for fan modifications or a new forced draft fan since SCR may increase the pressure drop beyond the capability of the existing fan. Low-NO<sub>x</sub> burner cost is also very site specific and depends on many factors such as adequacy of air and coal measurements in the boiler, pulverizer performance and boiler control. Although the DRB-4Z<sup>®</sup> low-NO<sub>x</sub> PC burner has been specifically developed for retrofit applications with potentially high throat velocity, the potential need for pressure part modifications impacts the cost of equipment. For these reasons, a range of capital costs was considered, which is according to multiple commercial installations of low-NO<sub>x</sub> burners and SCR systems. The SNCR capital and operating costs were based on the commercial experience of Fuel Tech.

**TABLE 1 INTEGRATED SYSTEM ECONOMICS FOR A 500 MW BOILER**

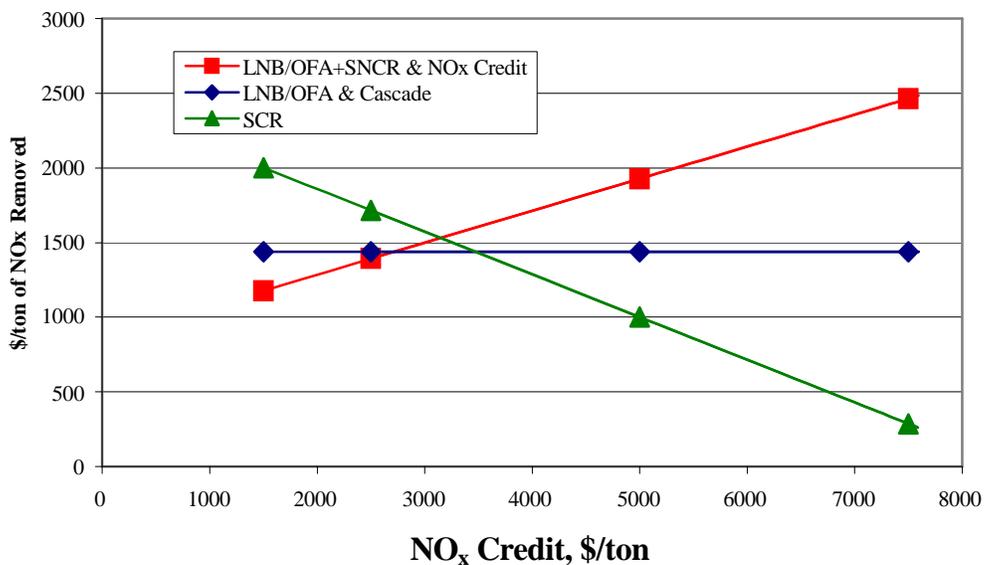
		Coal	Burner NO <sub>x</sub> (NO <sub>x</sub> , lb/10 <sup>6</sup> Btu)	Levelized Cost (\$/ton of NO <sub>x</sub> Removed)
1	LNB + OFA	PRB	0.15	389 to 704
2	LNB + OFA + SNCR	PRB	0.2	784 to 1099
3	LNB + OFA + Purchase Credit	PRB	0.2	746 to 1061
4	SCR + Sell Credit	All	0.5	1715 to 3918
5	CASCADE <sup>®</sup>	All	0.5	1506
6	LNB + OFA +SNCR + Purcahse Credit	HVB	0.3	1392 to 1706
7	LNB + OFA + CASCADE <sup>®</sup>	HVB	0.3	1440 to 1755
8	LNB + OFA + CASCADE <sup>®</sup>	MVB	0.4	1667 to 1981

The analysis shows that for boilers firing PRB coal, the DRB-4Z<sup>®</sup> low-NO<sub>x</sub> burner in combination with OFA has the lowest annual leveled cost (\$389 per ton of NO<sub>x</sub>) when the low-NO<sub>x</sub> burner emissions are 0.15 lb/10<sup>6</sup> Btu. If the low-NO<sub>x</sub> burner emissions are 0.2 lb/10<sup>6</sup> Btu, purchasing credit at \$2,500 per ton of NO<sub>x</sub> is the lowest combination cost alternative, \$746 to \$1,061 per ton of NO<sub>x</sub>. Although LNB/OFA plus the NO<sub>x</sub>OUT<sup>®</sup> combination cost is slightly higher, (\$784 to \$1,099 per ton of NO<sub>x</sub> removed) SNCR becomes the lowest cost strategy if the NO<sub>x</sub> credit cost increases to \$2,765 per ton. Since the NO<sub>x</sub> levels with wall-fired PRB firing units are very close to 0.15 lb/10<sup>6</sup> Btu, a utility may not choose to install SCR or SNCR on these units and use the DRB-4Z<sup>®</sup> low-NO<sub>x</sub> burner with OFA on these units and rely on system wide NO<sub>x</sub> emissions for compliance.

For boilers using high volatile bituminous coal, the total leveled costs for LNB + OFA + SNCR+ NO<sub>x</sub> credit (case 6) and LNB + OFA + CASCADE<sup>®</sup> (case 7) are \$1,392 to

\$1,706 and \$1,440 to \$1,755, respectively. At the \$2,500 per ton of NO<sub>x</sub> credit, these are both lower than the lower range of SCR cost of \$1,715 per ton of NO<sub>x</sub> removed. But the three options are close, and site specific considerations would determine the best technology. Ease of the SCR and/or burner retrofit could be a key to the determination of the selected technology.

As mentioned earlier, NO<sub>x</sub> credit costs have been very volatile. Figure 9 shows the effect of NO<sub>x</sub> credit cost. LNB + OFA + SNCR+ NO<sub>x</sub> credit (case 6) is the least cost option when NO<sub>x</sub> credit is less than \$2,725 per ton of NO<sub>x</sub>. When the NO<sub>x</sub> credit cost increases above \$2,725 per ton of NO<sub>x</sub>, CASCADE<sup>®</sup> becomes the lowest cost strategy and at \$3,460 per ton of NO<sub>x</sub>, SCR will become the least cost alternative. SCR may be the choice for newer and larger boilers while SNCR can be used for smaller and older units that are scheduled to shut down within the 5-10 years.



**FIGURE 9 NO<sub>x</sub> REDUCTION COST FOR UNITS FIRING BITUMINOUS COAL**

For boilers using medium volatile bituminous (MVB) coal, LNB + OFA could be combined with CASCADE. The NO<sub>x</sub> control cost for LNB + OFA + CASCADE<sup>®</sup> is \$1,667 to \$1,981 per ton of NO<sub>x</sub> removed. Again, the site specific situations would determine the suitability of the technology.

## 7 CONCLUSIONS

- Substantial NO<sub>x</sub> reductions were achieved utilizing B&W's DRB-4Z<sup>®</sup> low-NO<sub>x</sub> PC burner and SNCR utilizing a multiple nozzle lance (MNL). At full load, the MNL was tested at a temperature range of 1650 to 1980°F. The optimum injection was 1700-1750°F. At the full load conditions using SNCR and firing a PRB coal, a nominal NO<sub>x</sub> reduction of 25% was achieved from a range of baseline NO<sub>x</sub> values of 0.09 to 0.16 lb/10<sup>6</sup> Btu resulting in NO<sub>x</sub> values of 0.07 to 0.12 lb/10<sup>6</sup> Btu. At the reduced load (60%), the MNL was located at the furnace

- exit and reduced NO<sub>x</sub>, but not as much as with the wall-injectors. Incomplete chemical coverage of the gases is expected to be the reason.
- Our economic evaluation of DRB-4Z<sup>®</sup> and SNCR for a 500 MW<sub>e</sub> plant indicates that the technology is strongly dependent on the coal rank, cost of NO<sub>x</sub> credit, and retrofit difficulty. A site specific economic evaluation is required for each unit.
    - For boilers firing PRB coal, the NO<sub>x</sub> levels with DRB-4Z<sup>®</sup> and OFA are very close to 0.15 lb/10<sup>6</sup> Btu (commercial experience 0.15 – 0.2 lb/10<sup>6</sup>). The least cost strategy is: 1) purchasing NO<sub>x</sub> credit if the NO<sub>x</sub> credit cost is less than \$2,765 per ton of NO<sub>x</sub>, 2) SNCR if the credit cost is more than \$2,765 per ton of NO<sub>x</sub>, 3) SCR if NO<sub>x</sub> credit cost is more than \$4,760 per ton of NO<sub>x</sub>.
    - For boilers using high-volatile bituminous coals, the combination of DRB-4Z<sup>®</sup> and OFA + SNCR and purchasing credit could achieve a compliance strategy. The least cost strategy is dependent on the NO<sub>x</sub> credit cost: 1) purchasing NO<sub>x</sub> credit if the cost is less than \$3,460 per ton of NO<sub>x</sub>, 2) SCR if the credit cost is above \$3,460 per ton of NO<sub>x</sub>.
    - For boilers using medium volatile bituminous (MVB) coal, DRB-4Z<sup>®</sup> and OFA could be used to achieve a nominal NO<sub>x</sub> level of 0.4 lb/10<sup>6</sup> Btu. Additional NO<sub>x</sub> control equipment is required to achieve compliance. LNB + OFA + CASCADE<sup>®</sup> or an SCR system could be the least cost strategy depending on the site specific situations.

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