

LFG SPECIALTIES, INC.

September 21, 1993

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SEP 24 1993

Division of Air
Resources Management

Mr. Tom Cascio
Department of Environmental Protection
2600 Blare Stone Road
Tallahassee, FL 32399

RE: CO Emissions

Dear Mr. Cascio:

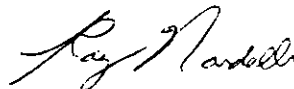
This letter is confirmation of our phone conversation on Monday, September 20th., concerning the carbon monoxide "CO" emission calculations given in the air permit application for the utility flare installed at Waste Management's Medley Landfill in Medley, Florida.

The CO emissions were calculated based upon a 480 PPM volume of CO in the exhaust flow from the flare. The 480 PPM was taken from empirical data on testing done on an enclosed flare operating at 1400° F. and a destructive efficiency of 98%. The testing in the enclosed flare should be considered as a worst case condition as it implies that 80% of the unburned methane is partially oxidized into CO.

In controlled testing carried out by the Federal EPA on open/utility type flares the CO emissions were measured at 0.37 lb/MMBTU. For landfill gas comprising 50% methane this equates to a volume rate of 140 PPM of CO. See EPA Manual AP-42 for details of testing and results. The 140 PPM is more in line with the actual CO emission rate we would anticipate from the flare, with the 480 PPM being an absolute worst case condition.

We hope this letter provides the clarification you requested. If you have any additional questions or require further documentation, please give us a call.

Respectfully,



Ray Nardelli
President

cc: Mr. Richard Dormier - Waste Management

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