UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

MAY 20 2009

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

David H. Penoyer
SCS Engineers
4041 Park Oaks Boulevard, Suite 100
Tampa, FL 33610

Dear Mr. Penoyer:

In your May 1, 2009 letter, you requested permission to use an alternative procedure to measure the flow rate of gas exiting the candlestick flare at the Richland Creek Road Landfill in Buford, Georgia. The flare is subject to 40 CFR Part 60.18 for an open flare burning landfill gas. You would like to use a mass flowmeter in place of Method 2, 2A, 2C, or 2D to satisfy the requirements of 60.18(f)(4). Your flowmeter will be sent to the manufacturer to assess the calibration prior to conducting the performance test. A copy of the flowmeter calibration certificate will be attached to the test report.

We approve your use of the mass flowmeter in place of Method 2, 2A, 2C or 2D to measure the flare flow rate at the Richland Creek Road Landfill in Buford, Georgia. Since this alternative method is applicable to other similar facilities in this source category, we will be posting this letter on our website at http://www.epa.gov/ttn/emc/approalt.html for use by other interested parties.

If you have questions or would like to discuss the matter further, please call Foston Curtis at (919) 541-1063, or you may e-mail him at curtis.foston@epa.gov.

Sincerely,

Connie Oldham

Conniesue B. Oldham, Ph.D., Group Leader
Measurements Technology Group

cc: Foston Curtis (E143-02))
Karen Hays, Georgia EPD
David McNeal, Region 4