

EAC OPERATIONS/PITISFIELD, IN A Subsidiary of Energy Answers Corporation

Environmentally Sound Solid Waste Management
500 Hubbard Avenue · Pittsfield · Massachusetts · 01201
Phone: 413-443-7373 Fax: 413-443-0308

September 20, 1994

Mr. Bob Bergquist, President LAKEFRONT ENTERPRISES, INC. 10 West Birch Road Norfolk, MA 02056

Dear Mr. Bergquist:

In response to your inquiry dated September 9, 1994, we have determined that virgin oil spills encapsulated with ENVIRO-BOND would be an acceptable product for disposal at our facility.

Whereas our permit under 310 CMR 7.02 (2)(a) of the "Regulations for Control of Air Pollution in Berkshire Air Pollution Control District", specifies that the material used as the absorbent must be organic, Larry Thompson, the developer of ENVIRO-BOND, has confirmed that the product is composed soley of organic materials. It appears from the features of ENVIRO-BOND that from an environmental standpoint this would be a superior product for handling oil spills.

It should be understood by those using this product that because it has a very high heating value both from the composition of the material itself and the fact that it encapsulates the organics, it commands a high disposal fee. Contrary to what one might perceive, this is a disadvantage from a cost standpoint calculated on a unit weight charge.

For example, if municipal solid waste (MSW) has a heating value of 4,500 BTU per pound and the furnaces are charged at 5 tons per hour, this translates to a heat rate of 45 million BTU/hour; consequently, when charged with a material having a heating value of 18,000 BTU per pound or four times the heating value, the charge rate can be only one forth as much, or 1 1/4 tons per hour. In other words, the burning process is limited by heat rate (BTU/hr), not mass flow (tons/hr). In order to maintain the same rate of revenue, the disposal fee per ton of ENVIRO-BOND material must be four times the normal rate for disposal of MSW. For the balance of 1994, the disposal rates are \$70 and \$280 per ton for MSW and ENVIRO-BOND, respectively.

If you need further information, please contact me.

Very truly yours,

Llewellyn E. Clark General Manager