

# **WASTE TIRE CO-FIRING FOR INCREASED WINTER STEAM PRODUCTION IN HARFORD COUNTY RESOURCE RECOVERY FACILITY**

**KLAUS S. FEINDLER**  
Beaumont Environmental Inc.  
Wheatley Heights, New York

**Discussion by:**

H. Gregor Rigo  
Rigo & Rigo Associates, Inc.  
Berea, Ohio

It is a pleasure to read a paper demonstrating that tires can be successfully stored, then used to match steam demand and generation at a MCU-based facility. I am puzzled, however, by how the summer and winter emission rates shown in Table 4 compare when expressed in units used in the New Source Performance Standard (40 CFR 60 Subpart Ea — e.g., concentrations at 7% O<sub>2</sub> and the stipulated averaging times).

In addition, it appears that Fig. 6 folds summer and winter period performance data back over upon itself. Am I correct?

Finally, the best fit curves shown in Figs. 6–9 do not appear to treat seasonality on a time series basis using a 12-month lag with a dummy variable distinguishing heating and cooling seasons. Please expand the conclusions to include a detailed description of the analyses performed and their validity.